** PUBLIC DISCLOSURE COPY **

Return of Organization Exempt From Income Tax Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except private foundations)

OMB No. 1545-0047

Inspection

Department of the Treasury Internal Revenue Service

▶ Do not enter social security numbers on this form as it may be made public.

► Go to www.irs.gov/Form990 for instructions and the latest information.

Open to Public

ΑI	For the	2020 calendar year, or tax year beginning and endi	ing				
В	Check if applicable	C Name of organization		D Employer identific	cation number		
X	Addres	TRANSPARENTEM LTD.					
	Name change			47-51754	72		
	□lnitial return □Final □return/	Number and street (or P.O. box if mail is not delivered to street address) 347 FIFTH AVE., SUITE 1402-443	m/suite	E Telephone number 646-685-			
	termin- ated			G Gross receipts \$	736,617.		
	Amend			H(a) Is this a group re			
	Application	F Name and address of principal officer: E • BENJAMIN SKINNER		for subordinates			
	pendin	SAME AS C ABOVE		H(b) Are all subordinates in	cluded? Yes No		
		empt status: X 501(c)(3) 501(c) () ((insert no.) 4947(a)(1) or □	527	If "No," attach a	list. See instructions		
		e: > WWW.TRANSPARENTEM.COM		H(c) Group exemption			
			L Year o	of formation: 2015 N	$$ State of legal domicile: ${ m DE}$		
Pa		Summary					
& Governance	1 !	Briefly describe the organization's mission or most significant activities: ${\hbox{ t TO}}$ ${\hbox{ t ERAI}}$	DICA S.	TE ENVIRONM	ENTAL AND		
rna	2	Check this box if the organization discontinued its operations or disposed of	of more	than 25% of its net as	sets.		
OVe	3	Number of voting members of the governing body (Part VI, line 1a)	3	6			
<u>م</u>		Number of independent voting members of the governing body (Part VI, line 1b)		4	6		
es	5	Total number of individuals employed in calendar year 2020 (Part V, line 2a)		5	19		
ĭŧ	6	Total number of volunteers (estimate if necessary)		6	7		
Activities		Total unrelated business revenue from Part VIII, column (C), line 12			0.		
_	b	Net unrelated business taxable income from Form 990-T, Part I, line 11		7b	0.		
Revenue				Prior Year	Current Year		
		Contributions and grants (Part VIII, line 1h)		3,760,168.	734,721.		
		Program service revenue (Part VIII, line 2g)		0. 171.	0. 199.		
Re		Investment income (Part VIII, column (A), lines 3, 4, and 7d)		-8,044.	1,697.		
	1	Other revenue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11e)		3,752,295.	736,617.		
		Total revenue - add lines 8 through 11 (must equal Part VIII, column (A), line 12)		3,732,293.	0.		
		Grants and similar amounts paid (Part IX, column (A), lines 1-3)		0.	0.		
"		Benefits paid to or for members (Part IX, column (A), line 4) Salaries, other compensation, employee benefits (Part IX, column (A), lines 5-10)		2,067,685.	2,467,371.		
Expenses		Professional fundraising fees (Part IX, column (A), line 11e)		0.	14,289.		
pen		Total fundraising expenses (Part IX, column (D), line 25) 175,046.		0.1	21/2051		
Ă		Other expenses (Part IX, column (A), lines 11a-11d, 11f-24e)		1,328,788.	1,163,565.		
		Total expenses. Add lines 13-17 (must equal Part IX, column (A), line 25)		3,396,473.	3,645,225.		
	19	Revenue less expenses. Subtract line 18 from line 12		-2,908,608.			
Net Assets or Fund Balances			Beg	355,822. ginning of Current Year	End of Year		
sets	20	Total assets (Part X, line 16)		3,835,405.	957,903.		
t As	21	Total liabilities (Part X, line 26)	\square	135,246.	166,352.		
SP.	22	Net assets or fund balances. Subtract line 21 from line 20		3,700,159.	791,551.		
	art II	Signature Block					
		lties of perjury, I declare that I have examined this return, including accompanying schedules and			/ knowledge and belief, it is		
true	, correc	t, and complete. Declaration of preparer (other than officer) is based on all information of which p	oreparer	has any knowledge.			
		Signature of officer		 Date			
Sig				Date			
Her	e	E. BENJAMIN SKINNER, PRESIDENT Type or print name and title					
			ID	Date Check	II PTIN		
Pai	d	Print/Type preparer's name TINA PEACHER Preparer's signature		11.10.2021 if -			
	1	Firm's name JM&M	12	self-employe	52-1853933		
	Only	Firm's address 10500 LITTLE PATUXENT PARKWAY, SUI	ITE	770			
	,	COLUMBIA, MD 21044			0-884-0220		
Ma	v the IF			11 110110 110. = =	X Yes No		

Pai	Check if Schedule O contains a response or note to any line in this Part III
_	
1	Briefly describe the organization's mission: TO ADVANCE THE WELL-BEING OF WORKERS AND COMMUNITIES BY EXPOSING HARD
	TRUTHS TO
	THOSE WITH THE POWER TO TRANSFORM INDUSTRIES. OUR GOAL IS TO ERADICATE
	ENVIRONMENTAL AND HUMAN RIGHTS
	Did the organization undertake any significant program services during the year which were not listed on the
2	
	prior Form 990 or 990-EZ? If "Yes," describe these new services on Schedule O.
•	
3	
	If "Yes," describe these changes on Schedule O.
4	Describe the organization's program service accomplishments for each of its three largest program services, as measured by expenses.
	Section 501(c)(3) and 501(c)(4) organizations are required to report the amount of grants and allocations to others, the total expenses, and
	revenue, if any, for each program service reported. (Code:) (Expenses \$ 3,007,452 • including grants of \$) (Revenue \$)
48	(Code:) (Expenses \$ 3,007,452. including grants of \$) (Revenue \$) SUPPLY CHAIN INVESTIGATIONS - SINCE OUR FOUNDING IN 2015, TRANSPARENTEM
	HAS USED OUR INVESTIGATIVE MODEL TO REVEAL ENVIRONMENTAL AND HUMAN
	RIGHTS ABUSES AROUND THE GLOBE. OUR PROJECTS HAVE SPARKED PROGRESS FOR
	WORKERS BY PROMPTING REMEDIATION OF PERVASIVE ISSUES IN APPAREL SUPPLY
	CHAINS, INCLUDING ENVIRONMENTAL DEGRADATION, FORCED LABOR, CHILD LABOR,
	AND OTHER FORMS OF WORKER EXPLOITATION. THROUGH OUR NOVEL APPROACH TO
	COMPANY ENGAGEMENT, OUR WORK HAS RESULTED IN THE REIMBURSEMENT OF
	RECRUITMENT-RELATED FEES, THE RETURN OF WITHHELD PASSPORTS TO THOUSANDS
	OF MIGRANT WORKERS, EXPANDED ACCESS TO GRIEVANCE CHANNELS TO HELP
	WORKERS ADVOCATE FOR THEMSELVES, IMPROVED LIVING AND WORKING
	CONDITIONS, AND ENHANCED COMPANY SOURCING AND HUMAN RIGHTS POLICIES TO
	IMPROVE CONDITIONS THROUGHOUT COMPANIES' SUPPLY CHAINS.
4b	(Code:) (Expenses \$ including grants of \$) (Revenue \$)
	, (adding graine si \$
4c	(Code:) (Expenses \$
4:	Otherways and in a (Deputite on Otherhala O)
4d	Other program services (Describe on Schedule O.)
4-	(Expenses \$\frac{\text{including grants of \$}}{3,007,452.}\) (Revenue \$\frac{\text{Revenue \$}}{\text{Notal program service expenses}}\)
<u>4e</u>	Total program service expenses 3,007,452.
	F0III 330 (2020)

			Yes	No
1	Is the organization described in section 501(c)(3) or 4947(a)(1) (other than a private foundation)? If "Yes," complete Schedule A	1	х	
2	Is the organization required to complete Schedule B, Schedule of Contributors?	2	X	
3	Did the organization engage in direct or indirect political campaign activities on behalf of or in opposition to candidates for			
	public office? If "Yes," complete Schedule C, Part I	3		Х
4	Section 501(c)(3) organizations. Did the organization engage in lobbying activities, or have a section 501(h) election in effect during the tax year? If "Yes," complete Schedule C, Part II	4		х
5	Is the organization a section 501(c)(4), 501(c)(5), or 501(c)(6) organization that receives membership dues, assessments, or			
	similar amounts as defined in Revenue Procedure 98-19? If "Yes," complete Schedule C, Part III	5		Х
6	Did the organization maintain any donor advised funds or any similar funds or accounts for which donors have the right to	6		х
7	provide advice on the distribution or investment of amounts in such funds or accounts? If "Yes," complete Schedule D, Part I Did the organization receive or hold a conservation easement, including easements to preserve open space,	0		22
'	the environment, historic land areas, or historic structures? If "Yes," complete Schedule D, Part II	7		X
8	Did the organization maintain collections of works of art, historical treasures, or other similar assets? If "Yes," complete			
	Schedule D, Part III	8		Х
9	Did the organization report an amount in Part X, line 21, for escrow or custodial account liability, serve as a custodian for			
	amounts not listed in Part X; or provide credit counseling, debt management, credit repair, or debt negotiation services?			
	If "Yes," complete Schedule D, Part IV	9		Х
10	Did the organization, directly or through a related organization, hold assets in donor-restricted endowments			
	or in quasi endowments? If "Yes," complete Schedule D, Part V	10		X
11	If the organization's answer to any of the following questions is "Yes," then complete Schedule D, Parts VI, VII, VIII, IX, or X as applicable.			
а	Did the organization report an amount for land, buildings, and equipment in Part X, line 10? If "Yes," complete Schedule D,			
	Part VI	11a	X	
b	Did the organization report an amount for investments - other securities in Part X, line 12, that is 5% or more of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part VII	11b		х
С	Did the organization report an amount for investments - program related in Part X, line 13, that is 5% or more of its total			
	assets reported in Part X, line 16? If "Yes," complete Schedule D, Part VIII	11c		X
d	Did the organization report an amount for other assets in Part X, line 15, that is 5% or more of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part IX	11d		x
е	Did the organization report an amount for other liabilities in Part X, line 25? If "Yes," complete Schedule D, Part X	11e		Х
f	Did the organization's separate or consolidated financial statements for the tax year include a footnote that addresses			
	the organization's liability for uncertain tax positions under FIN 48 (ASC 740)? If "Yes," complete Schedule D, Part X	11f	X	
12a	Did the organization obtain separate, independent audited financial statements for the tax year? If "Yes," complete Schedule D, Parts XI and XII	12a	Х	
b	Was the organization included in consolidated, independent audited financial statements for the tax year?			
	If "Yes," and if the organization answered "No" to line 12a, then completing Schedule D, Parts XI and XII is optional	12b	Х	
13	Is the organization a school described in section 170(b)(1)(A)(ii)? If "Yes," complete Schedule E	13		X
14a	Did the organization maintain an office, employees, or agents outside of the United States?	14a		X
b				
	investment, and program service activities outside the United States, or aggregate foreign investments valued at \$100,000	441	х	
45	or more? If "Yes," complete Schedule F, Parts I and IV Did the organization report on Part IX, column (A), line 3, more than \$5,000 of grants or other assistance to or for any	14b	Α.	
15	foreign organization? If "Yes," complete Schedule F, Parts II and IV	15		Х
16	Did the organization report on Part IX, column (A), line 3, more than \$5,000 of aggregate grants or other assistance to or for foreign individuals? If "Yes," complete Schedule F, Parts III and IV	16		х
17	Did the organization report a total of more than \$15,000 of expenses for professional fundraising services on Part IX,			v
40	column (A), lines 6 and 11e? If "Yes," complete Schedule G, Part I	17		X
18	Did the organization report more than \$15,000 total of fundraising event gross income and contributions on Part VIII, lines	40		X
10	1c and 8a? If "Yes," complete Schedule G, Part II	18	-	
19	Did the organization report more than \$15,000 of gross income from gaming activities on Part VIII, line 9a? If "Yes,"	10		х
20a	complete Schedule G, Part III Did the organization operate one or more hospital facilities? If "Yes," complete Schedule H	19 20a		X
	If "Yes" to line 20a, did the organization attach a copy of its audited financial statements to this return?	20a		
21	Did the organization report more than \$5,000 of grants or other assistance to any domestic organization or	_00		
	domestic government on Part IX, column (A), line 12 If "Yes," complete Schedule I, Parts I and II	21		x

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Part IV Checklist of Required Schedules (continued)

			Yes	No
22	Did the organization report more than \$5,000 of grants or other assistance to or for domestic individuals on			
	Part IX, column (A), line 2? If "Yes," complete Schedule I, Parts I and III	22		X
23	Did the organization answer "Yes" to Part VII, Section A, line 3, 4, or 5 about compensation of the organization's current			
	and former officers, directors, trustees, key employees, and highest compensated employees? If "Yes," complete			
	Schedule J	23	Х	
24a	Did the organization have a tax-exempt bond issue with an outstanding principal amount of more than \$100,000 as of the			
	last day of the year, that was issued after December 31, 2002? If "Yes," answer lines 24b through 24d and complete			
	Schedule K. If "No," go to line 25a	24a		X
	Did the organization invest any proceeds of tax-exempt bonds beyond a temporary period exception?	24b		
С	Did the organization maintain an escrow account other than a refunding escrow at any time during the year to defease			
	any tax-exempt bonds?	24c		
	Did the organization act as an "on behalf of" issuer for bonds outstanding at any time during the year?	24d		-
25 a	Section 501(c)(3), 501(c)(4), and 501(c)(29) organizations. Did the organization engage in an excess benefit			
	transaction with a disqualified person during the year? If "Yes," complete Schedule L, Part I	25a		X
b	Is the organization aware that it engaged in an excess benefit transaction with a disqualified person in a prior year, and			
	that the transaction has not been reported on any of the organization's prior Forms 990 or 990-EZ? If "Yes," complete			X
	Schedule L, Part I	25b		
26	Did the organization report any amount on Part X, line 5 or 22, for receivables from or payables to any current			
	or former officer, director, trustee, key employee, creator or founder, substantial contributor, or 35%			X
~=	controlled entity or family member of any of these persons? If "Yes," complete Schedule L, Part II	26		
27	Did the organization provide a grant or other assistance to any current or former officer, director, trustee, key employee,			
	creator or founder, substantial contributor or employee thereof, a grant selection committee member, or to a 35% controlled			X
20	entity (including an employee thereof) or family member of any of these persons? If "Yes," complete Schedule L, Part III	27		
28	Was the organization a party to a business transaction with one of the following parties (see Schedule L, Part IV			
	instructions, for applicable filing thresholds, conditions, and exceptions): A current or former officer, director, trustee, key employee, creator or founder, or substantial contributor? <i>If</i>			
а		28a		Х
h	"Yes," complete Schedule L, Part IV A family member of any individual described in line 28a? If "Yes," complete Schedule L, Part IV	28b		X
	A 35% controlled entity of one or more individuals and/or organizations described in lines 28a or 28b?	200		
·	"Yes," complete Schedule L, Part IV	28c		X
29	Did the organization receive more than \$25,000 in non-cash contributions? If "Yes," complete Schedule M	29		X
30	Did the organization receive contributions of art, historical treasures, or other similar assets, or qualified conservation			
00	contributions? If "Yes," complete Schedule M	30		х
31	Did the organization liquidate, terminate, or dissolve and cease operations? If "Yes," complete Schedule N, Part I	31		X
32	Did the organization sell, exchange, dispose of, or transfer more than 25% of its net assets? If "Yes," complete	<u> </u>		
-	Schedule N, Part II	32		Х
33	Did the organization own 100% of an entity disregarded as separate from the organization under Regulations			
	sections 301.7701-2 and 301.7701-3? If "Yes," complete Schedule R, Part I	33	Х	
34	Was the organization related to any tax-exempt or taxable entity? If "Yes," complete Schedule R, Part II, III, or IV, and			
,	Part V, line 1	34		Х
35 a	Did the organization have a controlled entity within the meaning of section 512(b)(13)?	35a		Х
	If "Yes" to line 35a, did the organization receive any payment from or engage in any transaction with a controlled entity			
	within the meaning of section 512(b)(13)? If "Yes," complete Schedule R, Part V, line 2	35b		
36	Section 501(c)(3) organizations. Did the organization make any transfers to an exempt non-charitable related organization?			
	If "Yes," complete Schedule R, Part V, line 2	36		X
37	Did the organization conduct more than 5% of its activities through an entity that is not a related organization			
	and that is treated as a partnership for federal income tax purposes? If "Yes," complete Schedule R, Part VI	37		Х
38	Did the organization complete Schedule O and provide explanations in Schedule O for Part VI, lines 11b and 19?			
_	Note: All Form 990 filers are required to complete Schedule O **T V Statements Regarding Other IRS Filings and Tax Compliance	38	X	
Pai				
	Check if Schedule O contains a response or note to any line in this Part V			\sqcup
			Yes	No
1a	Enter the number reported in Box 3 of Form 1096. Enter -0- if not applicable 16			
b	Enter the number of Forms W-2G included in line 1a. Enter -0- if not applicable			
С	Did the organization comply with backup withholding rules for reportable payments to vendors and reportable gaming			
	(gambling) winnings to prize winners?	1c	X	
		_	4 14 1/7	10000

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Part V Statements Regarding Other IRS Filings and Tax Compliance (continued)

			Yes	No
2a	Enter the number of employees reported on Form W-3, Transmittal of Wage and Tax Statements,			
	filed for the calendar year ending with or within the year covered by this return 2a2	9		
b	If at least one is reported on line 2a, did the organization file all required federal employment tax returns?	2b	X	
	Note: If the sum of lines 1a and 2a is greater than 250, you may be required to e-file (see instructions)			
3a	Did the organization have unrelated business gross income of \$1,000 or more during the year?	За		X
b	If "Yes," has it filed a Form 990-T for this year? If "No" to line 3b, provide an explanation on Schedule O	3b		
4a	At any time during the calendar year, did the organization have an interest in, or a signature or other authority over, a			
	financial account in a foreign country (such as a bank account, securities account, or other financial account)?	4a		X
b	If "Yes," enter the name of the foreign country			
	See instructions for filing requirements for FinCEN Form 114, Report of Foreign Bank and Financial Accounts (FBAR).			l
	Was the organization a party to a prohibited tax shelter transaction at any time during the tax year?	5a	-	X
	Did any taxable party notify the organization that it was or is a party to a prohibited tax shelter transaction?	5b	-	Х
	If "Yes" to line 5a or 5b, did the organization file Form 8886-T?	5c		\vdash
ьа	Does the organization have annual gross receipts that are normally greater than \$100,000, and did the organization solicit			X
h	any contributions that were not tax deductible as charitable contributions? If "Yes," did the organization include with every solicitation an express statement that such contributions or gifts	6a		1
D		6b		
7	Organizations that may receive deductible contributions under section 170(c).	05		
' a	Did the organization receive a payment in excess of \$75 made partly as a contribution and partly for goods and services provided to the payor?	7a		Х
	If "Yes," did the organization notify the donor of the value of the goods or services provided?	7b		
	Did the organization sell, exchange, or otherwise dispose of tangible personal property for which it was required			\vdash
	to file Form 8282?	7c		X
d	If "Yes," indicate the number of Forms 8282 filed during the year			
е	Did the organization receive any funds, directly or indirectly, to pay premiums on a personal benefit contract?	7e		X
f	Did the organization, during the year, pay premiums, directly or indirectly, on a personal benefit contract?	7f		X
g	If the organization received a contribution of qualified intellectual property, did the organization file Form 8899 as required? \dots	7g		Ь
h	If the organization received a contribution of cars, boats, airplanes, or other vehicles, did the organization file a Form 1098-C?	7h		$ldsymbol{oxed}$
8	Sponsoring organizations maintaining donor advised funds. Did a donor advised fund maintained by the			
	sponsoring organization have excess business holdings at any time during the year?	8		
9	Sponsoring organizations maintaining donor advised funds.			
a	Did the sponsoring organization make any taxable distributions under section 4966?	9a		\vdash
b 10	Did the sponsoring organization make a distribution to a donor, donor advisor, or related person?	9b		
10	Section 501(c)(7) organizations. Enter: Initiation fees and capital contributions included on Part VIII, line 12			
a b	Gross receipts, included on Form 990, Part VIII, line 12, for public use of club facilities 10b	┪		
11	Section 501(c)(12) organizations. Enter:	┪		
	Gross income from members or shareholders			
	Gross income from other sources (Do not net amounts due or paid to other sources against	1		
	amounts due or received from them.)			
12a	Section 4947(a)(1) non-exempt charitable trusts. Is the organization filing Form 990 in lieu of Form 1041?	12a		
b	If "Yes," enter the amount of tax-exempt interest received or accrued during the year			
13	Section 501(c)(29) qualified nonprofit health insurance issuers.			
а	Is the organization licensed to issue qualified health plans in more than one state?	13a		$oxed{oxed}$
	Note: See the instructions for additional information the organization must report on Schedule O.			
b	Enter the amount of reserves the organization is required to maintain by the states in which the			
	organization is licensed to issue qualified health plans	4		
	Enter the amount of reserves on hand			V
	Did the organization receive any payments for indoor tanning services during the tax year?	14a	-	X
	If "Yes," has it filed a Form 720 to report these payments? If "No," provide an explanation on Schedule O	14b	-	+
15	Is the organization subject to the section 4960 tax on payment(s) of more than \$1,000,000 in remuneration or	15		X
	excess parachute payment(s) during the year? If "Yes," see instructions and file Form 4720, Schedule N.	15		1
16	Let the appropriate and a street in stiff the supplication to the specific to the specific term of the specific terms of the specifi	16		X
	If "Yes," complete Form 4720, Schedule O.	10		Ħ
		Forn	. 000	(2020

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Part VI Governance, Management, and Disclosure For each "Yes" response to lines 2 through 7b below, and for a "No" response to line 8a, 8b, or 10b below, describe the circumstances, processes, or changes on Schedule O. See instructions.

					Λ			
Sec	tion A. Governing Body and Management			1				
		1 1	_	Yes	No			
1a	Enter the number of voting members of the governing body at the end of the tax year	1a	6					
	If there are material differences in voting rights among members of the governing body, or if the governing							
	body delegated broad authority to an executive committee or similar committee, explain on Schedule O.							
b	Enter the number of voting members included on line 1a, above, who are independent	1b	6					
2	Did any officer, director, trustee, or key employee have a family relationship or a business relationshi	p with any other						
	officer, director, trustee, or key employee?		2		X			
3	Did the organization delegate control over management duties customarily performed by or under the	e direct supervision						
	of officers, directors, trustees, or key employees to a management company or other person?		3		X			
4	Did the organization make any significant changes to its governing documents since the prior Form S				Х			
5	Did the organization become aware during the year of a significant diversion of the organization's as:				Х			
6	Did the organization have members or stockholders?				Х			
7a	Did the organization have members, stockholders, or other persons who had the power to elect or a		· -					
, a			7a		х			
h	more members of the governing body? Are any governance decisions of the organization reserved to (or subject to approval by) members, s		· /a					
b			76		х			
0	persons other than the governing body? Did the organization contemporaneously document the meetings held or written actions undertaken during the year		7b					
8			0	x				
a	The governing body?		۱	X				
b	Each committee with authority to act on behalf of the governing body?		8b	 ^				
9	Is there any officer, director, trustee, or key employee listed in Part VII, Section A, who cannot be real				37			
	organization's mailing address? If "Yes," provide the names and addresses on Schedule O		. 9		X			
Sec	tion B. Policies (This Section B requests information about policies not required by the Internal R	evenue Code.)		_				
				Yes	No			
10a	Did the organization have local chapters, branches, or affiliates?		10a		X			
b	If "Yes," did the organization have written policies and procedures governing the activities of such control of the organization have written policies and procedures governing the activities of such control of the organization have written policies and procedures governing the activities of such control of the organization have written policies and procedures governing the activities of such control of the organization have written policies and procedures governing the activities of such control of the organization have written policies and procedures governing the activities of such control of the organization have written policies and procedures governing the activities of such control of the organization have written policies and procedures governing the activities of such control of the organization have been procedured by the organization of the organization have been procedured by the organization of the or							
	and branches to ensure their operations are consistent with the organization's exempt purposes? $$		10b					
11a	Has the organization provided a complete copy of this Form 990 to all members of its governing bod	y before filing the form?	11a	X				
b	Describe in Schedule O the process, if any, used by the organization to review this Form 990.							
12a	and the second s							
b	Were officers, directors, or trustees, and key employees required to disclose annually interests that could give rise	to conflicts?	12b	X				
С	Did the organization regularly and consistently monitor and enforce compliance with the policy? If "Y	'es," describe						
	in Schedule O how this was done		12c	X				
13	Did the organization have a written whistleblower policy?			Х				
14	Did the organization have a written document retention and destruction policy?		_	Х				
15	Did the process for determining compensation of the following persons include a review and approve							
	persons, comparability data, and contemporaneous substantiation of the deliberation and decision?							
а	The organization's CEO, Executive Director, or top management official		15a		Х			
	Other officers or key employees of the organization				Х			
~	If "Yes" to line 15a or 15b, describe the process in Schedule O (see instructions).							
162	Did the organization invest in, contribute assets to, or participate in a joint venture or similar arrange	ment with a						
100			16a		Х			
h	taxable entity during the year? If "Yes," did the organization follow a written policy or procedure requiring the organization to evalua		100		_			
b	in joint venture arrangements under applicable federal tax law, and take steps to safeguard the organization of evaluation and take steps to safeguard the organization of evaluation in joint venture arrangements under applicable federal tax law, and take steps to safeguard the organization of evaluation in joint venture arrangements under applicable federal tax law, and take steps to safeguard the organization of evaluation in joint venture arrangements under applicable federal tax law, and take steps to safeguard the organization of evaluation in joint venture arrangements under applicable federal tax law, and take steps to safeguard the organization of evaluation in joint venture arrangements under applicable federal tax law, and take steps to safeguard the organization of evaluation in joint venture arrangements under applicable federal tax law, and take steps to safeguard the organization of evaluation in joint venture arrangements under applicable federal tax law, and take steps to safeguard the organization of evaluation in joint venture arrangements under applicable federal tax law, and take steps to safeguard the organization of evaluation in joint venture arrangements under applicable federal tax law, and take steps to safeguard the organization of evaluation in joint venture are also safeguard to evaluation of eval							
			16h					
800	exempt status with respect to such arrangements? tion C. Disclosure		16b					
17	List the states with which a copy of this Form 990 is required to be filed NY		(0) -	. A - "	1-1-1			
18	Section 6104 requires an organization to make its Forms 1023 (1024 or 1024-A, if applicable), 990, a	na 990-1 (Section 501(c)	(ദ)s onl	y) avail	apie			
	for public inspection. Indicate how you made these available. Check all that apply.	0.4.4.6						
		on Schedule O)						
19	Describe on Schedule O whether (and if so, how) the organization made its governing documents, co	onflict of interest policy,	and fina	ıncial				
	statements available to the public during the tax year.							
20	State the name, address, and telephone number of the person who possesses the organization's bo	oks and records						
	DEBBIE LI - 646-954-2579							
	347 FIFTH AVE., SUITE 1402-443, NEW YORK, NY 1001	.6						

032006 12-23-20 Form **990** (2020)

Part VII Compensation of Officers, Directors, Trustees, Key Employees, Highest Compensated Employees, and Independent Contractors

Check if Schedule O contains a response or note to any line in this Part VII

Section A. Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees

- 1a Complete this table for all persons required to be listed. Report compensation for the calendar year ending with or within the organization's tax year.
- List all of the organization's **current** officers, directors, trustees (whether individuals or organizations), regardless of amount of compensation. Enter -0- in columns (D), (E), and (F) if no compensation was paid.
 - List all of the organization's current key employees, if any. See instructions for definition of "key employee."
- List the organization's five current highest compensated employees (other than an officer, director, trustee, or key employee) who received reportable compensation (Box 5 of Form W-2 and/or Box 7 of Form 1099-MISC) of more than \$100,000 from the organization and any related organizations.
- List all of the organization's **former** officers, key employees, and highest compensated employees who received more than \$100,000 of reportable compensation from the organization and any related organizations.
- List all of the organization's **former directors or trustees** that received, in the capacity as a former director or trustee of the organization, more than \$10,000 of reportable compensation from the organization and any related organizations.

Check this box if neither the organization nor any related organization compensated any current officer, director, or trustee.

See instructions for the order in which to list the persons above.

(A) Name and title	(B) Average hours per	(do	(C) Position (do not check more than one box, unless person is both an officer and a director/trustee)					(D) Reportable compensation	(E) Reportable compensation	(F) Estimated amount of
	week (list any hours for related organizations below line)	stee or director	Institutional trustee	Mey employee Employee Employee Employee Employee Employee Employee Employee Employee Emmer			from the organization (W-2/1099-MISC)	from related organizations (W-2/1099-MISC)	other compensation from the organization and related organizations	
(1) TIMOTHY R. SANDLER VP OF INVESTIGATIONS	40.00				х			234,852.	0.	30,135.
(2) E. BENJAMIN SKINNER	40.00				Δ			234,032.	0.	30,133.
PRESIDENT		1		х				206,000.	0.	9,064.
(3) CAM TU RINSCHE	40.00							,		<u> </u>
VP OF STRATEGIC ENGAGEMENT		1				Х		191,274.	0.	19,281.
(4) RACHEL G. JACKSON, VP OF	40.00									
OPERATIONS AND SECRETARY				Х				124,016.	0.	16,279.
(5) BRANDIE SASSER	40.00							115 001	0	10 700
DEP. VP OF STRATEGIC ENGAGEMENT	40 00	_			_	Х		115,291.	0.	18,729.
(6) ARAM SCHVEY DEPUTY VP OF INVESTIGATION	40.00	l				X		124,000.	0.	5,784.
(7) ANDREW KORFHAGE	40.00	\vdash			_	^		124,000.	0.	3,704.
STRATEGIC ENGAGEMENT MANAGER	40.00	ł				x		113,709.	0.	15,996.
(8) SHEELA AHLUWALIA	40.00					 				
SENIOR LABOR ANALYST		l				Х		114,000.	0.	5,365.
(9) EMILY MARTINEZ, DIRECTOR, THEN	1.00	Х		Х				0.	0.	
CO-CHAIR AS OF JUNE 2020 (10) DAN VIEDERMAN, DIRECTOR, THEN	1.00	^		Δ				0.	0.	0.
CO-CHAIR AS OF JUNE 2020	1.00	Х		х				0.	0.	0.
(11) M. KYLE WRIGHT	1.00									
TREASURER		Х		Х				0.	0.	0.
(12) HISHAM MUNDOL	1.00									
DIRECTOR	1 00	Х						0.	0.	0.
(13) NEHA MISRA	1.00	,,						0	0	0
DIRECTOR AS OF JUNE 2020	1 00	Х			_	_		0.	0.	0.
(14) ARUNA KASHYAP	1.00	Х						0.	0.	0.
(15) AMOL MEHRA	1.00	^						0.	0.	0.
CHAIR UNTIL JUNE 2020	1.00	Х		х				0.	0.	0.
						_				
		-								
					<u> </u>					- 000

Form **990** (2020)

		ARENTEM LT	ГD	•						47-5	175	472	P	age 8
Par	t VII Section A. Officers, Directors, T	rustees, Key Em	ploy	ees	, and	d Hi	ighe	st C	Compensated Employe	es (continued)				
	(A) Name and title	(B) Average hours per week	box	not c	Posi heck i ss per id a di	ition more rson	than	h an	(D) Reportable compensation from	(E) Reportable compensation from related	on	am	(F) timate lount other	
		(list any hours for related organizations below line)	Individual trustee or director	Institutional trustee	Officer	Key employee	Highest compensated employee	Former	the organization (W-2/1099-MISC)	organizatior (W-2/1099-MI		fro orga and	oensa om th anizat I relat nizati	e ion ed
	Subtotal								1,223,142.		0.	120	0,6	
d	Total from continuation sheets to Par Total (add lines 1b and 1c)							<u> </u>	1,223,142.	000 - f	0.	120	0,6	33.
2	Total number of individuals (including b compensation from the organization		iose	IIST	ed ar	OOV	e) wr	10 r	eceived more than \$100	J,UUU of reportar	ле ——		Yes	No
3	Did the organization list any former officient 1a? <i>If</i> "Yes," <i>complete Schedule J f</i>	or such individual										3		Х
4 5	For any individual listed on line 1a, is the and related organizations greater than \$\frac{3}{2}\$ Did any person listed on line 1a receive	\$150,000? If "Yes,	" co	mple	ete S	Sche	edule	e J t	for such individual			4	X	
	rendered to the organization? If "Yes," of tion B. Independent Contractors	=				-			-			5		Х
1	Complete this table for your five highest the organization. Report compensation	· ·									npens	ation f	rom	
	(A) Name and busin	ess address	N	INC	3				(B) Description of s	ervices	С	(Comper		n

Form **990** (2020)

Total number of independent contractors (including but not limited to those listed above) who received more than

\$100,000 of compensation from the organization

Form	n 990	(2	2020) TRA	NSPA	ARENTEM	I LTD.			47-5175472 Pag			
Pa	rt VI	Ш	Statement of Re	venue)							
			Check if Schedule O	contains	s a response	or note to any lir	ne in this Part VIII					
							(A) Total revenue	(B) Related or exempt	(C)	(D) Revenue excluded		
nts nts	1 a	a	Federated campaigns		1a							
ar our			Membership dues									
s, C Am			Fundraising events									
Gift			Related organizations									
JS,	6	е	Government grants (contr	ributions	s) 1e	250,000.						
rtior er S	f	f	All other contributions, gifts,									
ğ. Ç.			similar amounts not included	above .		484,721.						
Contributions, Gifts, Grants and Other Similar Amounts	ç	g	Noncash contributions included in	lines 1a-1	1g \$		F24 F04					
<u>a</u> 0	ŀ	h	Total. Add lines 1a-1f			1	734,721.					
						Business Code						
Program Service Revenue	2 8											
erv ue	k	b										
m S		C										
gra		d										
Pro		e	All alla su anna anna anna anna da a									
_	Ī		All other program service									
	3	<u>y</u>	Total. Add lines 2a-2f Investment income (include									
	3		other similar amounts)				199.			199.		
	4		Income from investment of									
	5		Royalties									
			Tioyanioo		(i) Real	(ii) Personal						
	6 a	а	Gross rents	6a								
			Less: rental expenses	6b								
			Rental income or (loss)	6c								
			Net rental income or (loss)			•						
			Gross amount from sales of	$\overline{}$) Securities	(ii) Other						
			assets other than inventory	7a								
	k	b	Less: cost or other basis									
ne			and sales expenses	7b								
evenue		С	Gain or (loss)	7c								
ď			Net gain or (loss)									
Other	8 8	a	Gross income from fundraising	ng events	s (not							
ð			including \$		of							
			contributions reported on	line 1c)	. See							
			Part IV, line 18									
			Less: direct expenses									
			Net income or (loss) from		· —	_						
	9 a	a	Gross income from gamin	•								
			Part IV, line 19									
			Less: direct expenses									
			Net income or (loss) from			>						
	10 a	a	Gross sales of inventory, I									
			and allowances			+						
			Less: cost of goods sold			'						
	-	ت	Net income or (loss) from	sales 01	inventory	Business Code						
Snc	11 a	2	GAIN ON FOREI	GN (URREN	900099	1,408.			1,408.		
Miscellaneous Revenue			CREDIT CARD R			900099	289.			289.		
ella ver	_	C								200.		
Sc			All other revenue									
Σ			Total. Add lines 11a-11d				1,697.					
	12	_	Total revenue. See instruction				736,617.	0.	0.	1,896.		

032009 12-23-20

Part IX | Statement of Functional Expenses

Section 501(c)(3) and 501(c)(4) organizations must complete all columns. All other organizations must complete column (A).

_	Check if Schedule O contains a respons	se or note to any line in (A)	this Part IX(B)	(C)	(D)
	not include amounts reported on lines 6b, 8b, 9b, and 10b of Part VIII.	Total expenses	Program service expenses	Management and general expenses	(D) Fundraising expenses
1	Grants and other assistance to domestic organizations				
	and domestic governments. See Part IV, line 21				
2	Grants and other assistance to domestic				
	individuals. See Part IV, line 22				
3	Grants and other assistance to foreign				
	organizations, foreign governments, and foreign				
	individuals. See Part IV, lines 15 and 16				
4	Benefits paid to or for members				
5	Compensation of current officers, directors,				
	trustees, and key employees	620,346.	496,304.	90,914.	33,128
6	Compensation not included above to disqualified				
	persons (as defined under section 4958(f)(1)) and				
	persons described in section 4958(c)(3)(B)				
7	Other salaries and wages	1,499,774.	1,203,252.	211,934.	84,588
8	Pension plan accruals and contributions (include	, ,		,	, . , .
_	section 401(k) and 403(b) employer contributions)	54,538.	43,794.	7,818.	2.926
9	Other employee benefits	150,962.	114,699.	35,941.	2,926 322
0	Payroll taxes	141,751.	114,043.	21,824.	5,884
1	Fees for services (nonemployees):			22/0210	3,002
	` ' ' '				
a		114,000.	99,356.	10,983.	3,661
b	S	49,073.	42,769.	4,728.	1,576
С.	5 ······	49,073.	42,709.	4,720.	1,570
	Lobbying	14,289.			1/ 200
е	ř –	14,209.			14,289
f					
g	,	620 001	C11 072	10 700	7 020
	column (A) amount, list line 11g expenses on Sch O.)	630,001.	611,973.	10,789.	7,239
12	Advertising and promotion	45 420	20 070	11 640	005
13	Office expenses	45,432.	32,878.	11,649.	905
14	Information technology	1,961.	80.	1,881.	
15	Royalties		40.00	10.01	
16	Occupancy	80,482.	63,997.	12,364.	4,121
17	Travel	65,430.	62,980.	827.	1,623
18	Payments of travel or entertainment expenses				
	for any federal, state, or local public officials				
19	Conferences, conventions, and meetings	6,743.	6,743.		
20	Interest				
21	Payments to affiliates				
22	Depreciation, depletion, and amortization	17,408.	12,429.	3,382.	1,597
23	Insurance	51,258.	27,019.	22,309.	1,930
24	Other expenses. Itemize expenses not covered				
-	above (List miscellaneous expenses on line 24e. If				
	line 24e amount exceeds 10% of line 25, column (A) amount, list line 24e expenses on Schedule O.)				
а	DUES AND SUBSCRIPTIONS	65,980.	57,441.	5,087.	3,452
a b	STAFF DEVELOPMENT	25,695.	17,695.	8,000.	2,232
C	LICENSES AND REGISTRATI	8,658.	=:,055.	1,448.	7,210
-	RECRUITMENT	1,444.		849.	595
d		<u> </u>		047.	390
e		3,645,225.	3,007,452.	462,727.	175,046
25	Total functional expenses. Add lines 1 through 24e	3,043,443.	3,007,434.	404,141.	1/5,040
26	Joint costs. Complete this line only if the organization				
	reported in column (B) joint costs from a combined				
	educational campaign and fundraising solicitation.				
	Check here if following SOP 98-2 (ASC 958-720)				Form 990 (202

Form **990** (2020)

Pa	rt X	Balance Sheet					
		Check if Schedule O contains a response or	note to a	ny line in this Part X			
					(A) Beginning of year		(B) End of year
	1	Cash - non-interest-bearing		644,557.	1	441,833.	
	2	Savings and temporary cash investments			385,294.	2	385,383.
	3	Pledges and grants receivable, net		2,682,934.	3	56,549.	
	4	Accounts receivable, net			4		
	5	Loans and other receivables from any current					
		trustee, key employee, creator or founder, su					
		controlled entity or family member of any of t		5			
	6	Loans and other receivables from other disqu	ualified pe	ersons (as defined			
		under section 4958(f)(1)), and persons descri	bed in se	ection 4958(c)(3)(B)		6	
ţ	7	Notes and loans receivable, net				7	
Assets	8	Inventories for sale or use				8	
V	9	Prepaid expenses and deferred charges			76,581.	9	49,865.
	10a	Land, buildings, and equipment: cost or othe	r				
		basis. Complete Part VI of Schedule D	10a	78,747.			
	b	Less: accumulated depreciation	10b	65,879.	30,276.	10c	12,868.
	11	Investments - publicly traded securities			11		
	12	Investments - other securities. See Part IV, lin		12			
	13	Investments - program-related. See Part IV, lin		13			
	14	Intangible assets		14			
	15	Other assets. See Part IV, line 11	15,763.	15	11,405.		
	16	Total assets. Add lines 1 through 15 (must e	1	3,835,405.	16	957,903.	
	17	Accounts payable and accrued expenses			135,246.	17	166,352.
	18	Grants payable		18			
	19	Deferred revenue			19		
	20	Tax-exempt bond liabilities				20	
	21	Escrow or custodial account liability. Comple				21	
es	22	Loans and other payables to any current or for					
Ħ		trustee, key employee, creator or founder, su					
Liabilities		controlled entity or family member of any of t				22	
_	23	Secured mortgages and notes payable to un				23	
	24	Unsecured notes and loans payable to unrela				24	
	25	Other liabilities (including federal income tax,					
		parties, and other liabilities not included on lin	nes 17-24	I). Complete Part X			
		of Schedule D			135,246.	25	166,352.
	26	Total liabilities. Add lines 17 through 25			133,240.	26	100,332.
es		Organizations that follow FASB ASC 958, cand complete lines 27, 28, 32, and 33.	:песк пе	re 🖊 🔼			
anc anc	07	• • • • • • •			586,924.	27	729,225.
3al	27	Net assets without donor restrictions Net assets with donor restrictions			3,113,235.	28	62,326.
Jd.	28	Organizations that do not follow FASB ASC			3,113,233.	20	02,520.
Ξ		and complete lines 29 through 33.	<i>3</i> 330, Ci	leck liefe			
Net Assets or Fund Balances	29	Capital stock or trust principal, or current fun			29		
ets	30	Paid-in or capital surplus, or land, building, or				30	
Ass	31	Retained earnings, endowment, accumulated				31	
et,	32	Total net assets or fund balances			3,700,159.	32	791,551.
Z	33	Total liabilities and net assets/fund balances			3,835,405.	33	957,903.
	J	Total liabilities and fiet assets/fund balances			3,000,400.	აა	557,505.

Par	t XI Reconciliation of Net Assets							
	Check if Schedule O contains a response or note to any line in this Part XI							
1	Total revenue (must equal Part VIII, column (A), line 12)	1		6,6				
2	Total expenses (must equal Part IX, column (A), line 25)		3,64					
3	Revenue less expenses. Subtract line 2 from line 1			2,908,608. 3,700,159.				
4	Net assets or fund balances at beginning of year (must equal Part X, line 32, column (A))							
5								
6	Donated services and use of facilities	6						
	Investment expenses	7						
	Prior period adjustments	8						
	Other changes in net assets or fund balances (explain on Schedule O)	9			0.			
	Net assets or fund balances at end of year. Combine lines 3 through 9 (must equal Part X, line 32,							
	column (B))	10	79	1,5	51.			
Par	t XII Financial Statements and Reporting							
	Check if Schedule O contains a response or note to any line in this Part XII				X			
				Yes	No			
1	Accounting method used to prepare the Form 990: Cash X Accrual Other							
	If the organization changed its method of accounting from a prior year or checked "Other," explain in Schedule O.							
2a	Were the organization's financial statements compiled or reviewed by an independent accountant?		2a		X			
	If "Yes," check a box below to indicate whether the financial statements for the year were compiled or reviewe	d on a						
	separate basis, consolidated basis, or both:							
	Separate basis Consolidated basis Both consolidated and separate basis							
b	Were the organization's financial statements audited by an independent accountant?		2b	Х				
	If "Yes," check a box below to indicate whether the financial statements for the year were audited on a separa	te basis,						
	consolidated basis, or both:							
	Separate basis X Consolidated basis Both consolidated and separate basis							
С	If "Yes" to line 2a or 2b, does the organization have a committee that assumes responsibility for oversight of the	ne audit,						
	review, or compilation of its financial statements and selection of an independent accountant?		2c	Х				
	If the organization changed either its oversight process or selection process during the tax year, explain on Sc							
За	As a result of a federal award, was the organization required to undergo an audit or audits as set forth in the Si	ngle Audit						
	Act and OMB Circular A-133?		3a		X			
	If "Yes," did the organization undergo the required audit or audits? If the organization did not undergo the required	ired audit						
	or audits, explain why on Schedule O and describe any steps taken to undergo such audits		3b					

SCHEDULE A

(Form 990 or 990-EZ)

Department of the Treasury Internal Revenue Service

Name of the organization

Public Charity Status and Public Support Complete if the organization is a section 501(c)(3) organization or a section

4947(a)(1) nonexempt charitable trust.

► Attach to Form 990 or Form 990-EZ.

▶ Go to www.irs.gov/Form990 for instructions and the latest information.

OMB No. 1545-0047

Open to Public Inspection

TRANSPARENTEM LTD.

Employer identification number 47-5175472

Pa	Part I Reason for Public Charity Status. (All organizations must complete this part.) See instructions.							
The	orgar	nization is not a private found	lation because it is: (For lines 1 through 12, o	check only	one box.)		
1		A church, convention of ch	urches, or association	on of churches describe	d in sectio	n 170(b)(1)(A)(i).	
2		A school described in secti	ion 170(b)(1)(A)(ii).	Attach Schedule E (Forn	n 990 or 99	90-EZ).)		
3		A hospital or a cooperative					ii).	
4	一	A medical research organiz						the hospital's name
•		city, and state:	ation operated in co	njanotion with a noopita	. 400011000		(10,0), 1,0,1,0,1,1,1,1,1,1,1,1,1,1,1,1,1,1,1,	ano mospitar o marno,
5		An organization operated for	ar the benefit of a co	llogo or university owner	d or opera	tod by a a	avaramantal unit dasarik	and in
3				niege of diliversity owner	u or opera	ted by a g	overimental unit descrit	Ded III
_		section 170(b)(1)(A)(iv). (C	• •					
6	37	A federal, state, or local government						
7								
	section 170(b)(1)(A)(vi). (Complete Part II.)							
8	Щ	A community trust describe	ed in section 170(b)((1)(A)(vi). (Complete Par	t II.)			
9		An agricultural research org	ganization described	in section 170(b)(1)(A)(ix) operate	ed in conju	ınction with a land-grant	college
		or university or a non-land-g	grant college of agric	ulture (see instructions).	Enter the	name, city	y, and state of the colleg	je or
		university:						
10		An organization that norma	Illy receives (1) more	than 33 1/3% of its sup	port from	contributio	ons, membership fees, a	nd gross receipts from
		activities related to its exen						
		income and unrelated busin						
		See section 509(a)(2). (Cor		(1000 00011011 011 1001) 11				
11		An organization organized a		ively to test for public sa	afety See	section 50)9(a)(4)	
12	一	An organization organized a	•	*	•			nurnoses of one or
12		more publicly supported or	•		•			• •
			•					DIRECK THE DOX III
		lines 12a through 12d that				•	•	. at ta
а		☐ Type I. A supporting organization.	· · · · · · · · · · · · · · · · · · ·	•				
		the supported organization			a majority (of the dire	ctors or trustees of the s	supporting
		organization. You must o						
b		☐ Type II. A supporting org	anization supervised	d or controlled in connec	tion with it	s support	ed organization(s), by ha	aving
		control or management o	of the supporting orga	anization vested in the s	ame perso	ons that co	ontrol or manage the sup	ported
		_ organization(s). You mus	t complete Part IV,	Sections A and C.				
С			egrated. A supporting	g organization operated	in connec	tion with,	and functionally integrat	ed with,
		its supported organization	n(s) (see instructions	s). You must complete l	Part IV, Se	ections A,	D, and E.	
d		Type III non-functionally	y integrated. A supp	orting organization oper	ated in co	nnection \	with its supported organi	ization(s)
		that is not functionally int	egrated. The organiz	zation generally must sa	tisfy a dist	ribution re	quirement and an attent	iveness
		requirement (see instruct	•	,	•		•	
е		Check this box if the orga	•					
·		functionally integrated, or					2 1) po 1, 1) po 11, 1) po 11.	
f	Ent	er the number of supported of	* *	rially integrated support	ing organi	Lation.		
'		vide the following information		od organization(s)				
9		(i) Name of supported	(ii) EIN	(iii) Type of organization	(iv) Is the orga	nization listed	(v) Amount of monetary	(vi) Amount of other
		organization	(-,	(described on lines 1-10	in your governi Yes	ng document?	support (see instructions)	support (see instructions)
		-		above (see instructions))	103	140		
Tota	al							

Part II Support Schedule for Organizations Described in Sections 170(b)(1)(A)(iv) and 170(b)(1)(A)(vi)

(Complete only if you checked the box on line 5, 7, or 8 of Part I or if the organization failed to qualify under Part III. If the organization fails to qualify under the tests listed below, please complete Part III.)

Sec	ction A. Public Support	71	•	,			
	ndar year (or fiscal year beginning in)	(a) 2016	(b) 2017	(c) 2018	(d) 2019	(e) 2020	(f) Total
	Gifts, grants, contributions, and	. ,	()	()	` '	,	()
	membership fees received. (Do not						
	include any "unusual grants.")	2047855.	3185381.	4553514.	3760168.	734,721.	14281639.
2	Tax revenues levied for the organ-						
	ization's benefit and either paid to						
	or expended on its behalf						
3	The value of services or facilities						
	furnished by a governmental unit to						
	the organization without charge	0048055	2405204	4552544	2560460	F24 F04	1 4004 600
4	Total. Add lines 1 through 3	2047855.	3185381.	4553514.	3760168.	734,721.	14281639.
5	The portion of total contributions						
	by each person (other than a						
	governmental unit or publicly						
	supported organization) included						
	on line 1 that exceeds 2% of the						
	amount shown on line 11,						
	column (f)						10418258.
	Public support. Subtract line 5 from line 4.						3863381.
	ction B. Total Support				1		
	ndar year (or fiscal year beginning in)	(a) 2016	(b) 2017	(c) 2018	(d) 2019	(e) 2020	(f) Total 14281639.
7	Amounts from line 4	2047855.	3185381.	4553514.	3760168.	/34,/21.	14281639.
8	Gross income from interest,						
	dividends, payments received on						
	securities loans, rents, royalties,		•	120	4.54	100	F 0 0
	and income from similar sources		8.	130.	171.	199.	508.
9	Net income from unrelated business						
	activities, whether or not the						
	business is regularly carried on						
10	Other income. Do not include gain						
	or loss from the sale of capital						264
	assets (Explain in Part VI.)		72.			289.	361.
11							14282508.
12	Gross receipts from related activities,					12	
13	First 5 years. If the Form 990 is for th				-		
800	organization, check this box and store ction C. Computation of Publ		roontago				P
	Public support percentage for 2020 (I			actumen (f)		14	27.05 %
	Public support percentage for 2020 (Public support percentage from 2019)					15	<u>27.05 %</u>
	33 1/3% support test - 2020. If the o					<u> </u>	
102	stop here. The organization qualifies	•		•		•	
h	33 1/3% support test - 2019. If the c						
~	and stop here. The organization qual	-					
17a	10% -facts-and-circumstances tes						
	and if the organization meets the fact	ū					ŕ
	meets the facts-and-circumstances te					viriow the organiz	V
h	10% -facts-and-circumstances tes	-			-		
	more, and if the organization meets the	_					. 5/6 61
	organization meets the facts-and-circle				-		
18	Private foundation. If the organization		-				
	ato roundation in the organizatio	did not officer a	~ 3/ 3/ III 0 10, 10	., ,	-, 5.155K HIIS DOX E	555 111511 401101	

Schedule A (Form 990 or 990-EZ) 2020

Part III | Support Schedule for Organizations Described in Section 509(a)(2)

(Complete only if you checked the box on line 10 of Part I or if the organization failed to qualify under Part II. If the organization fails to qualify under the tests listed below, please complete Part II.)

Se	ction A. Public Support		,				
Cale	ndar year (or fiscal year beginning in)	(a) 2016	(b) 2017	(c) 2018	(d) 2019	(e) 2020	(f) Total
1	Gifts, grants, contributions, and						
	membership fees received. (Do not						
	include any "unusual grants.")						
2	Gross receipts from admissions,						
	merchandise sold or services per-						
	formed, or facilities furnished in any activity that is related to the						
	organization's tax-exempt purpose						
3	Gross receipts from activities that						
	are not an unrelated trade or bus-						
	iness under section 513						
4	Tax revenues levied for the organ-						
	ization's benefit and either paid to						
	or expended on its behalf						
5	The value of services or facilities						
	furnished by a governmental unit to						
	the organization without charge						
6	Total. Add lines 1 through 5						
78	Amounts included on lines 1, 2, and						
	3 received from disqualified persons						
k	Amounts included on lines 2 and 3 received from other than disqualified persons that						
	exceed the greater of \$5,000 or 1% of the						
	amount on line 13 for the year						
(Add lines 7a and 7b						
8	Public support. (Subtract line 7c from line 6.)						
	ction B. Total Support		1				
	endar year (or fiscal year beginning in)	(a) 2016	(b) 2017	(c) 2018	(d) 2019	(e) 2020	(f) Total
	Amounts from line 6						
10a	Gross income from interest, dividends, payments received on						
	securities loans, rents, royalties,						
	and income from similar sources						
k	Unrelated business taxable income						
	(less section 511 taxes) from businesses						
	acquired after June 30, 1975				-		
	Add lines 10a and 10b						
11	Net income from unrelated business activities not included in line 10b,						
	whether or not the business is						
40	regularly carried on						
12	Other income. Do not include gain or loss from the sale of capital						
	assets (Explain in Part VI.)			-	-		
	Total support. (Add lines 9, 10c, 11, and 12.)		1	<u> </u>			<u> </u>
14	First 5 years. If the Form 990 is for th	•		•	•	. , , ,	tion,
50	check this box and stop here ction C. Computation of Publ						_
	Public support percentage for 2020 (l			column (f))		15	0/
	Public support percentage from 2019					16	%
	ction D. Computation of Inves					10	%
	Investment income percentage for 20					17	%
	Investment income percentage from 2					18	
	33 1/3% support tests - 2020. If the						
.50	more than 33 1/3%, check this box a						
ŀ	33 1/3% support tests - 2019. If the						
	line 18 is not more than 33 1/3%, che	•			•		
20	Private foundation If the organization						

Part IV | Supporting Organizations

(Complete only if you checked a box in line 12 on Part I. If you checked box 12a, Part I, complete Sections A and B. If you checked box 12b, Part I, complete Sections A and C. If you checked box 12c, Part I, complete Sections A, D, and E. If you checked box 12d, Part I, complete Sections A and D, and complete Part V.)

Section A. All Supporting Organizations

- 1 Are all of the organization's supported organizations listed by name in the organization's governing documents? If "No," describe in Part VI how the supported organizations are designated. If designated by class or purpose, describe the designation. If historic and continuing relationship, explain.
- 2 Did the organization have any supported organization that does not have an IRS determination of status under section 509(a)(1) or (2)? If "Yes," explain in **Part VI** how the organization determined that the supported organization was described in section 509(a)(1) or (2).
- **3a** Did the organization have a supported organization described in section 501(c)(4), (5), or (6)? If "Yes," answer lines 3b and 3c below.
- **b** Did the organization confirm that each supported organization qualified under section 501(c)(4), (5), or (6) and satisfied the public support tests under section 509(a)(2)? If "Yes," describe in **Part VI** when and how the organization made the determination.
- c Did the organization ensure that all support to such organizations was used exclusively for section 170(c)(2)(B) purposes? If "Yes," explain in Part VI what controls the organization put in place to ensure such use.
- **4a** Was any supported organization not organized in the United States ("foreign supported organization")? *If* "Yes," and if you checked box 12a or 12b in Part I, answer lines 4b and 4c below.
- **b** Did the organization have ultimate control and discretion in deciding whether to make grants to the foreign supported organization? If "Yes," describe in **Part VI** how the organization had such control and discretion despite being controlled or supervised by or in connection with its supported organizations.
- c Did the organization support any foreign supported organization that does not have an IRS determination under sections 501(c)(3) and 509(a)(1) or (2)? If "Yes," explain in Part VI what controls the organization used to ensure that all support to the foreign supported organization was used exclusively for section 170(c)(2)(B) purposes.
- 5a Did the organization add, substitute, or remove any supported organizations during the tax year? If "Yes," answer lines 5b and 5c below (if applicable). Also, provide detail in Part VI, including (i) the names and EIN numbers of the supported organizations added, substituted, or removed; (ii) the reasons for each such action; (iii) the authority under the organization's organizing document authorizing such action; and (iv) how the action was accomplished (such as by amendment to the organizing document).
- **b** Type I or Type II only. Was any added or substituted supported organization part of a class already designated in the organization's organizing document?
- c Substitutions only. Was the substitution the result of an event beyond the organization's control?
- 6 Did the organization provide support (whether in the form of grants or the provision of services or facilities) to anyone other than (i) its supported organizations, (ii) individuals that are part of the charitable class benefited by one or more of its supported organizations, or (iii) other supporting organizations that also support or benefit one or more of the filing organization's supported organizations? If "Yes," provide detail in Part VI.
- 7 Did the organization provide a grant, loan, compensation, or other similar payment to a substantial contributor (as defined in section 4958(c)(3)(C)), a family member of a substantial contributor, or a 35% controlled entity with regard to a substantial contributor? If "Yes," complete Part I of Schedule L (Form 990 or 990-EZ).
- 8 Did the organization make a loan to a disqualified person (as defined in section 4958) not described in line 7? If "Yes," complete Part I of Schedule L (Form 990 or 990-EZ).
- **9a** Was the organization controlled directly or indirectly at any time during the tax year by one or more disqualified persons, as defined in section 4946 (other than foundation managers and organizations described in section 509(a)(1) or (2))? If "Yes," provide detail in **Part VI.**
- **b** Did one or more disqualified persons (as defined in line 9a) hold a controlling interest in any entity in which the supporting organization had an interest? If "Yes," provide detail in **Part VI.**
- c Did a disqualified person (as defined in line 9a) have an ownership interest in, or derive any personal benefit from, assets in which the supporting organization also had an interest? If "Yes," provide detail in Part VI.
- 10a Was the organization subject to the excess business holdings rules of section 4943 because of section 4943(f) (regarding certain Type II supporting organizations, and all Type III non-functionally integrated supporting organizations)? If "Yes," answer line 10b below.
 - **b** Did the organization have any excess business holdings in the tax year? (Use Schedule C, Form 4720, to determine whether the organization had excess business holdings.)

	Yes	No
1		
2		
3a		
3b		
3с		
4a		
4b		
4c		
F		
5a		
5b		
5c		
6		
7		
8		
0-		
9a		
9b		
0.0		
9с		
10a		
10b		

Pai	t IV Supporting Organizations (continued)			
			Yes	No
11	Has the organization accepted a gift or contribution from any of the following persons?			
а	A person who directly or indirectly controls, either alone or together with persons described in lines 11b and			
	11c below, the governing body of a supported organization?	11a		
b	A family member of a person described in line 11a above?	11b		
	A 35% controlled entity of a person described in line 11a or 11b above? If "Yes" to line 11a, 11b, or 11c, provide			
	detail in Part VI.	11c		
Sec	tion B. Type I Supporting Organizations			
			Yes	No
1	Did the governing body, members of the governing body, officers acting in their official capacity, or membership of one or			
-	more supported organizations have the power to regularly appoint or elect at least a majority of the organization's officers,			
	directors, or trustees at all times during the tax year? If "No," describe in Part VI how the supported organization(s)			
	effectively operated, supervised, or controlled the organization's activities. If the organization had more than one supported organization, describe how the powers to appoint and/or remove officers, directors, or trustees were allocated among the			
	supported organizations and what conditions or restrictions, if any, applied to such powers during the tax year.	1		
2	Did the organization operate for the benefit of any supported organization other than the supported			
_	organization(s) that operated, supervised, or controlled the supporting organization? If "Yes," explain in			
	Part VI how providing such benefit carried out the purposes of the supported organization(s) that operated,			
	supervised, or controlled the supporting organization.	2		
Sec	tion C. Type II Supporting Organizations		l	
			Yes	No
1	Were a majority of the organization's directors or trustees during the tax year also a majority of the directors		103	140
•	or trustees of each of the organization's supported organization(s)? If "No," describe in Part VI how control			
	or management of the supporting organization was vested in the same persons that controlled or managed			
	the supported organization(s).	1		
Sec	tion D. All Type III Supporting Organizations			
-	aon B. 7th Type in Supporting Organizations		Yes	No
4	Did the expenientian provide to each of its supported expenientians, by the last day of the fifth month of the		res	NO
1	Did the organization provide to each of its supported organizations, by the last day of the fifth month of the			
	organization's tax year, (i) a written notice describing the type and amount of support provided during the prior tax			
	year, (ii) a copy of the Form 990 that was most recently filed as of the date of notification, and (iii) copies of the			
•	organization's governing documents in effect on the date of notification, to the extent not previously provided?	1		
2	Were any of the organization's officers, directors, or trustees either (i) appointed or elected by the supported			
	organization(s) or (ii) serving on the governing body of a supported organization? If "No," explain in Part VI how			
2	the organization maintained a close and continuous working relationship with the supported organization(s).	2		
3	By reason of the relationship described in line 2, above, did the organization's supported organizations have a			
	significant voice in the organization's investment policies and in directing the use of the organization's			
	income or assets at all times during the tax year? If "Yes," describe in Part VI the role the organization's			
<u>Sac</u>	supported organizations played in this regard. tion E. Type III Functionally Integrated Supporting Organizations	3		<u> </u>
1	Check the box next to the method that the organization used to satisfy the Integral Part Test during the yea(see instructions). The organization satisfied the Activities Test. Complete line 2 below.	•		
a	The organization satisfied the Activities rest. <i>Complete line 2 below.</i> The organization is the parent of each of its supported organizations. <i>Complete line 3 below.</i>			
b	The organization is the parent of each of its supported organizations. Complete line's below. The organization supported a governmental entity. Describe in Part VI how you supported a governmental entity (see in	etructio	nol	
C		Struction		No
2	Activities Test. Answer lines 2a and 2b below.		Yes	No
а	Did substantially all of the organization's activities during the tax year directly further the exempt purposes of			
	the supported organization(s) to which the organization was responsive? If "Yes," then in Part VI identify			
	those supported organizations and explain how these activities directly furthered their exempt purposes,			
	how the organization was responsive to those supported organizations, and how the organization determined	0-		
L	that these activities constituted substantially all of its activities.	2a		
b	Did the activities described in line 2a, above, constitute activities that, but for the organization's involvement,			
	one or more of the organization's supported organization(s) would have been engaged in? If "Yes," explain in			
	Part VI the reasons for the organization's position that its supported organization(s) would have engaged in	01		
_	these activities but for the organization's involvement.	2b		
3	Parent of Supported Organizations. Answer lines 3a and 3b below.			
а	Did the organization have the power to regularly appoint or elect a majority of the officers, directors, or	_		
1.	trustees of each of the supported organizations? If "Yes" or "No" provide details in Part VI .	3a		
D	Did the organization exercise a substantial degree of direction over the policies, programs, and activities of each			1

032025 01-25-21

of its supported organizations? If "Yes," describe in Part VI the role played by the organization in this regard.

Pa	rt V Type III Non-Functionally Integrated 509(a)(3) Supporti	ng Organ	izations	
1	Check here if the organization satisfied the Integral Part Test as a qualifyi	ng trust on I	Nov. 20, 1970 (explain in	Part VI). See instructions.
	All other Type III non-functionally integrated supporting organizations must	st complete	Sections A through E.	
Sect	ion A - Adjusted Net Income		(A) Prior Year	(B) Current Year (optional)
1	Net short-term capital gain	1		
2	Recoveries of prior-year distributions	2		
3	Other gross income (see instructions)	3		
4	Add lines 1 through 3.	4		
5	Depreciation and depletion	5		
6	Portion of operating expenses paid or incurred for production or			
	collection of gross income or for management, conservation, or			
	maintenance of property held for production of income (see instructions)	6		
7	Other expenses (see instructions)	7		
8	Adjusted Net Income (subtract lines 5, 6, and 7 from line 4)	8		
Sect	ion B - Minimum Asset Amount		(A) Prior Year	(B) Current Year (optional)
1	Aggregate fair market value of all non-exempt-use assets (see			
	instructions for short tax year or assets held for part of year):			
а	Average monthly value of securities	1a		
b	Average monthly cash balances	1b		
С	Fair market value of other non-exempt-use assets	1c		
d	Total (add lines 1a, 1b, and 1c)	1d		
е	Discount claimed for blockage or other factors			
	(explain in detail in Part VI):			
2	Acquisition indebtedness applicable to non-exempt-use assets	2		
3	Subtract line 2 from line 1d.	3		
4	Cash deemed held for exempt use. Enter 0.015 of line 3 (for greater amount,			
	see instructions).	4		
5	Net value of non-exempt-use assets (subtract line 4 from line 3)	5		
6	Multiply line 5 by 0.035.	6		
7	Recoveries of prior-year distributions	7		
8	Minimum Asset Amount (add line 7 to line 6)	8		
Sect	ion C - Distributable Amount			Current Year
1	Adjusted net income for prior year (from Section A, line 8, column A)	1		
2	Enter 0.85 of line 1.	2		
3	Minimum asset amount for prior year (from Section B, line 8, column A)	3		
4	Enter greater of line 2 or line 3.	4		
5	Income tax imposed in prior year	5		
6	Distributable Amount. Subtract line 5 from line 4, unless subject to			
	emergency temporary reduction (see instructions).	6		
7	Check here if the current year is the organization's first as a non-functional	ally integrate	ed Type III supporting org	ganization (see
	instructions)			

Schedule A (Form 990 or 990-EZ) 2020

Fai	Type in Non-Functionally integrated 509	(a)(b) Supporting Orga	amzations (continu	<u>ued) </u>	
Secti	on D - Distributions				Current Year
1	Amounts paid to supported organizations to accomplish exe	· · · ·		1	
2	Amounts paid to perform activity that directly furthers exempt	ot purposes of supported			
	organizations, in excess of income from activity		2		
3	Administrative expenses paid to accomplish exempt purpose	es of supported organization	ns	3	
4	Amounts paid to acquire exempt-use assets			4	
5	Qualified set-aside amounts (prior IRS approval required - pro	ovide details in Part VI)		5	
6	Other distributions (describe in Part VI). See instructions.			6	
7	Total annual distributions. Add lines 1 through 6.			7	
8	Distributions to attentive supported organizations to which to	he organization is responsive	е		
	(provide details in Part VI). See instructions.			8 9	
9	,				
10	Line 8 amount divided by line 9 amount		ı	10	
Secti	on E - Distribution Allocations (see instructions)	(i) Excess Distributions	(ii) Underdistributio Pre-2020	ns	(iii) Distributable Amount for 2020
1	Distributable amount for 2020 from Section C, line 6				
2	Underdistributions, if any, for years prior to 2020 (reason-				
	able cause required - explain in Part VI). See instructions.				
3	Excess distributions carryover, if any, to 2020				
a	From 2015				
b	From 2016				
С	From 2017				
d	From 2018				
e	From 2019				
f	Total of lines 3a through 3e				
<u>g</u>	Applied to underdistributions of prior years				
<u>h</u>	Applied to 2020 distributable amount				
i_	Carryover from 2015 not applied (see instructions)				
j_	Remainder. Subtract lines 3g, 3h, and 3i from line 3f.				
4	Distributions for 2020 from Section D,				
	line 7: \$				
	Applied to underdistributions of prior years				
	Applied to 2020 distributable amount				
	Remainder. Subtract lines 4a and 4b from line 4.				
5	Remaining underdistributions for years prior to 2020, if				
	any. Subtract lines 3g and 4a from line 2. For result greater				
	than zero, explain in Part VI. See instructions.				
6	Remaining underdistributions for 2020. Subtract lines 3h				
	and 4b from line 1. For result greater than zero, explain in				
	Part VI. See instructions.				
7	Excess distributions carryover to 2021. Add lines 3j				
	and 4c.				
8	Breakdown of line 7:				
	Excess from 2016				
	Excess from 2017				
	Excess from 2018 Excess from 2019				
	Excess from 2019 Excess from 2020				
_	LAUGUS II UIII 2020				

Schedule A (Form 990 or 990-EZ) 2020

Part VI Supplemental Information. Provide the explanations required by Part II, line 10; Part II, line 17a or 17b; Part III, line 12; Part IV, Section A, lines 1, 2, 3b, 3c, 4b, 4c, 5a, 6, 9a, 9b, 9c, 11a, 11b, and 11c; Part IV, Section B, lines 1 and 2; Part IV, Section C, line 1; Part IV, Section D, lines 2 and 3; Part IV, Section E, lines 1c, 2a, 2b, 3a, and 3b; Part V, line 1; Part V, Section B, line 1e; Part V, Section D, lines 5, 6, and 8; and Part V, Section E, lines 2, 5, and 6. Also complete this part for any additional information. (See instructions.)

SCHEDULE A, PART II, LINE 10, EXPLANATION FOR OTHER INCOME:

MISCELLANEOUS REVENUE

2017 AMOUNT: \$ 72.

2020 AMOUNT: \$ 289.

PART II, SECTION C, LINE 17A, FACTS AND CIRCUMSTANCES TEST:

THE ORGANIZATION MEETS THE FACTS AND CIRCUMSTANCES TEST UNDER TREASURY

REGULATION SECTION 1.170A-9(F)(3) BY THE FOLLOWING:

- 1. THE ORGANIZATION MEETS THE 10% SUPPORT TEST AS OVER 20% OF THE ORGANIZATION'S SUPPORT COMES FROM THE GENERAL PUBLIC AND GOVERNMENTAL UNITS.
- 2. THE ORGANIZATION IS ORGANIZED AND OPERATED TO ATTRACT NEW AND

 ADDITIONAL PUBLIC OR GOVERNMENTAL SUPPORT ON A CONTINUOUS BASIS. THE

 ORGANIZATION CONTINUES TO HAVE AND SEEK CONTRIBUTIONS AND SUPPORT FROM

 VARIOUS SOURCES TO SUPPORT OPERATIONS AND FULLFILL THE ORGANIZATION'S

 MISSION.
- 3. OTHER FACTS AND CIRCUMSTANCES SHOW THAT THE ORGANIZATION QUALIFIES AS A "PUBLICLY SUPPORTED" ORGANIZATION UNDER THE FACTS AND CIRCUMSTANCES TEST
 BY THE FOLLOWING:
- A. BY IMPACTING A BROAD CROSS-SECTION OF THE POPULATION EFFECTED BY
 ENVIRONMENTAL ABUSES IN GLOBAL SUPPLY CHAINS.
- B. REPRESENTATIVE GOVERNING BODY THE ORGANIZATION'S BOARD OF DIRECTORS

 ARE HIGHLY RESPECTED INDIVIDUALS WHO ARE DEDICATED TO THE ORGANIZATION'S

 Schedule A (Form 990 or 990-EZ) 2020

Part IV, Section A, lines 1, 2, 3b, 3c, 4b, 4c, 5a, 6, 9a, 9b, 9c, 11a, 11b, and 11c; Part IV, Section B, lines 1 and 2; Part IV, Section D, lines 2 and 3; Part IV, Section E, lines 1c, 2a, 2b, 3a, and 3b; Part V, line 1; Part V, Section B, line 1e; Part V, Section D, lines 5, 6, and 8; and Part V, Section E, lines 2, 5, and 6. Also complete this part for any additional information. (See instructions.)
MISSION.
C. PROGRAM ACCOMPLISHMENTS - DURING 2020 THE ORGANIZATION CONTINUED ITS
MISSION TO ILLUMINATE HUMAN AND ENVIRONMENTAL ABUSES IN MANUFACTURING
SUPPLY CHAINS IN ORDER TO SPUR ERADICATION OF THOSE ABUSES.

Schedule B

(Form 990, 990-EZ, or 990-PF)

Department of the Treasury Internal Revenue Service **Schedule of Contributors**

➤ Attach to Form 990, Form 990-EZ, or Form 990-PF.

➤ Go to www.irs.gov/Form990 for the latest information.

OMB No. 1545-0047

2020

Name of the organization

TRANSPARENTEM LTD.

Employer identification number

47-5175472

Organization type (check one):						
Filers of:	Section:					
Form 990 or 990-EZ	$\overline{\mathbf{X}}$ 501(c)(3) (enter number) organization					
	4947(a)(1) nonexempt charitable trust not treated as a private foundation					
	527 political organization					
Form 990-PF	501(c)(3) exempt private foundation					
	4947(a)(1) nonexempt charitable trust treated as a private foundation					
	501(c)(3) taxable private foundation					
	neck if your organization is covered by the General Rule or a Special Rule . ote: Only a section 501(c)(7), (8), or (10) organization can check boxes for both the General Rule and a Special Rule. See instructions.					
General Rule						
For an organization filing Form 990, 990-EZ, or 990-PF that received, during the year, contributions totaling \$5,000 or more (in money or property) from any one contributor. Complete Parts I and II. See instructions for determining a contributor's total contributions.						
Special Rules						
sections 509(a)(1) any one contributo	n described in section 501(c)(3) filing Form 990 or 990-EZ that met the 33 1/3% support test of the regulations under and 170(b)(1)(A)(vi), that checked Schedule A (Form 990 or 990-EZ), Part II, line 13, 16a, or 16b, and that received from or, during the year, total contributions of the greater of (1) \$5,000; or (2) 2% of the amount on (i) Form 990, Part VIII, line 1h; line 1. Complete Parts I and II.					
contributor, during literary, or education	n described in section 501(c)(7), (8), or (10) filing Form 990 or 990-EZ that received from any one the year, total contributions of more than \$1,000 exclusively for religious, charitable, scientific, onal purposes, or for the prevention of cruelty to children or animals. Complete Parts I (entering) instead of the contributor name and address), II, and III.					
year, contributions is checked, enter h purpose. Don't cor	n described in section 501(c)(7), (8), or (10) filing Form 990 or 990-EZ that received from any one contributor, during the exclusively for religious, charitable, etc., purposes, but no such contributions totaled more than \$1,000. If this box here the total contributions that were received during the year for an exclusively religious, charitable, etc., mplete any of the parts unless the General Rule applies to this organization because it received nonexclusively e, etc., contributions totaling \$5,000 or more during the year \bigsim \$\$					
but it must answer "No" on	nat isn't covered by the General Rule and/or the Special Rules doesn't file Schedule B (Form 990, 990-EZ, or 990-PF), Part IV, line 2, of its Form 990; or check the box on line H of its Form 990-EZ or on its Form 990-PF, Part I, line 2, to the filing requirements of Schedule B (Form 990, 990-EZ, or 990-PF).					

 $\ \, \text{LHA} \ \, \text{For Paperwork Reduction Act Notice, see the instructions for Form 990, 990-EZ, or 990-PF.}$

Schedule B (Form 990, 990-EZ, or 990-PF) (2020)

Name of organization Employer identification number

TRANSPARENTEM LTD.

47-5175472

Part I	Contributors (see instructions). Use duplicate copies of Part I if additional	I space is needed.	
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
1		\$\$	Person X Payroll Noncash (Complete Part II for noncash contributions.)
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
2		\$ 50,000.	Person X Payroll
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
3		\$ <u>10,000.</u>	Person X Payroll
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
4		\$ 25,000.	Person X Payroll Noncash (Complete Part II for noncash contributions.)
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
5		\$ 130,000.	Person X Payroll
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
6		\$5,000.	Person X Payroll Noncash (Complete Part II for noncash contributions.)

Name of organization

Employer identification number

TRANS	PARENTEM LTD.		47-5175472
Part I	Contributors (see instructions). Use duplicate copies of Part I i	f additional space is needed.	
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributio	(d) Type of contribution
7		\$\$	Person X Payroll Noncash (Complete Part II for noncash contributions.)
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributio	ns Type of contribution
		\$	Person Payroll Noncash (Complete Part II for noncash contributions.)
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributio	(d) ons Type of contribution
		\$	Person Payroll Noncash (Complete Part II for noncash contributions.)
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributio	ns Type of contribution
		\$	Person Payroll Noncash (Complete Part II for noncash contributions.)
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributio	ns Type of contribution
		\$	Person Payroll Noncash (Complete Part II for noncash contributions.)
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributio	(d)
		\$	Person Payroll Noncash (Complete Part II for

noncash contributions.)

Name of organization Employer identification number

TRANSPARENTEM LTD.

47-5175472

Part II	Noncash Property (see instructions). Use duplicate copies of Par	t II if additional space is needed.	
(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (See instructions.)	(d) Date received
(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (See instructions.)	(d) Date received
(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (See instructions.)	(d) Date received
(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (See instructions.)	(d) Date received
		 \$	
(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (See instructions.)	(d) Date received
(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (See instructions.)	(d) Date received
		 \$	

Name of organization **Employer identification number** TRANSPARENTEM LTD. 47-5175472 Part III Exclusively religious, charitable, etc., contributions to organizations described in section 501(c)(7), (8), or (10) that total more than \$1,000 for the year from any one contributor. Complete columns (a) through (e) and the following line entry. For organizations completing Part III, enter the total of exclusively religious, charitable, etc., contributions of \$1,000 or less for the year. (Enter this info. once.) Use duplicate copies of Part III if additional space is needed. (a) No. `fŕom Part I (b) Purpose of gift (c) Use of gift (d) Description of how gift is held (e) Transfer of gift Transferee's name, address, and ZIP + 4 Relationship of transferor to transferee (a) No. from (b) Purpose of gift (c) Use of gift (d) Description of how gift is held Part I (e) Transfer of gift Transferee's name, address, and ZIP + 4 Relationship of transferor to transferee (a) No. from (b) Purpose of gift (c) Use of gift (d) Description of how gift is held Part I (e) Transfer of gift Transferee's name, address, and ZIP + 4 Relationship of transferor to transferee (a) No. from (b) Purpose of gift (c) Use of gift (d) Description of how gift is held Part I (e) Transfer of gift Transferee's name, address, and ZIP + 4 Relationship of transferor to transferee

SCHEDULE D (Form 990)

Department of the Treasury Internal Revenue Service

Supplemental Financial Statements

► Complete if the organization answered "Yes" on Form 990,
Part IV, line 6, 7, 8, 9, 10, 11a, 11b, 11c, 11d, 11e, 11f, 12a, or 12b.

► Attach to Form 990.

►Go to www.irs.gov/Form990 for instructions and the latest information.

OMB No. 1545-0047 Open to Public Inspection

Name of the organization

TRANSPARENTEM LTD

Employer identification number 47-5175472

Part I Organizations Maintaining Donor Advised Funds or Other Similar Funds or Accounts. Complete if the organization answered "Yes" on Form 990, Part IV, line 6. (a) Donor advised funds (b) Funds and other accounts. Total number at end of year Aggregate value of contributions to (during year)	
(a) Donor advised funds (b) Funds and other account 1 Total number at end of year	ints
1 Total number at end of year	irits
2 Aggregate value of contributions to (during year)	
3 Aggregate value of grants from (during year)	
4 Aggregate value at end of year	
5 Did the organization inform all donors and donor advisors in writing that the assets held in donor advised funds	
are the organization's property, subject to the organization's exclusive legal control?	└── No
6 Did the organization inform all grantees, donors, and donor advisors in writing that grant funds can be used only	
for charitable purposes and not for the benefit of the donor or donor advisor, or for any other purpose conferring	
impermissible private benefit?	No_
Part II Conservation Easements. Complete if the organization answered "Yes" on Form 990, Part IV, line 7.	
1 Purpose(s) of conservation easements held by the organization (check all that apply).	
Preservation of land for public use (for example, recreation or education) Preservation of a historically important land are	a
Protection of natural habitat Preservation of a certified historic structure	
Preservation of open space	
2 Complete lines 2a through 2d if the organization held a qualified conservation contribution in the form of a conservation easement on	the last
day of the tax year.	e Tax Year
a Total number of conservation easements 2a	
b Total acreage restricted by conservation easements 2b	
c Number of conservation easements on a certified historic structure included in (a) 2c	
d Number of conservation easements included in (c) acquired after 7/25/06, and not on a historic structure	
listed in the National Register	
3 Number of conservation easements modified, transferred, released, extinguished, or terminated by the organization during the tax	
year▶	
4 Number of states where property subject to conservation easement is located	
5 Does the organization have a written policy regarding the periodic monitoring, inspection, handling of	
violations, and enforcement of the conservation easements it holds?	☐ No
6 Staff and volunteer hours devoted to monitoring, inspecting, handling of violations, and enforcing conservation easements during the	year
•	
7 Amount of expenses incurred in monitoring, inspecting, handling of violations, and enforcing conservation easements during the year	
▶ \$	
8 Does each conservation easement reported on line 2(d) above satisfy the requirements of section 170(h)(4)(B)(i)	
and section 170(h)(4)(B)(ii)?	☐ No
9 In Part XIII, describe how the organization reports conservation easements in its revenue and expense statement and	
balance sheet, and include, if applicable, the text of the footnote to the organization's financial statements that describes the	
organization's accounting for conservation easements.	
Part III Organizations Maintaining Collections of Art, Historical Treasures, or Other Similar Assets.	
Complete if the organization answered "Yes" on Form 990, Part IV, line 8.	
1a If the organization elected, as permitted under FASB ASC 958, not to report in its revenue statement and balance sheet works	
of art, historical treasures, or other similar assets held for public exhibition, education, or research in furtherance of public	
service, provide in Part XIII the text of the footnote to its financial statements that describes these items.	
b If the organization elected, as permitted under FASB ASC 958, to report in its revenue statement and balance sheet works of	
art, historical treasures, or other similar assets held for public exhibition, education, or research in furtherance of public service,	
provide the following amounts relating to these items:	
(i) Revenue included on Form 990, Part VIII, line 1	
(ii) Assets included in Form 990, Part X	
2 If the organization received or held works of art, historical treasures, or other similar assets for financial gain, provide	
the following amounts required to be reported under FASB ASC 958 relating to these items:	
a Revenue included on Form 990, Part VIII, line 1	
b Assets included in Form 990, Part X	

032051 12-01-20

LHA For Paperwork Reduction Act Notice, see the Instructions for Form 990.

Schedule D (Form 990) 2020

	rt III Organizations Maintaining C	ollections of A	rt, His	torical Tr	easures, o	or Oth	er Simi	lar Asse	ts (continu	ied)
3	Using the organization's acquisition, accession	n, and other record	ls, chec	k any of the	following tha	t make	significan	t use of its		
	collection items (check all that apply):									
а	Public exhibition	d		Loan or exc	hange progra	am				
b	Scholarly research	е		Other						
С	Preservation for future generations									
4	Provide a description of the organization's co	llections and explain	n how th	ney further t	he organizati	on's exe	empt purp	ose in Par	t XIII.	
5	During the year, did the organization solicit or									
	to be sold to raise funds rather than to be ma								Yes	☐ No
Pai	t IV Escrow and Custodial Arrang								line 9, or	
	reported an amount on Form 990, Part			Ü						
1a	Is the organization an agent, trustee, custodia	an or other intermed	diary for	contribution	ns or other as	sets no	t included	I		
	on Form 990, Part X?								Yes	☐ No
b	If "Yes," explain the arrangement in Part XIII a									
	, 1		3						Amount	
С	Beginning balance						1c			
	Additions during the year									
	Distributions during the year									
f	Ending balance									
	Did the organization include an amount on Fo								Yes	No
	If "Yes," explain the arrangement in Part XIII.									
	t V Endowment Funds. Complete if									
		(a) Current year		rior year	(c) Two year			years back	(e) Four v	ears back
1a	Beginning of year balance	(a) carrone year	(2):	nor your	(6)	- Duon	(4)	jouro suom	(0) . ou.)	
b	Contributions				1					
	Net investment earnings, gains, and losses				<u> </u>					
	Grants or scholarships				<u> </u>					
	Other expenditures for facilities									
е	·									
	and programs									
	Administrative expenses				+					
_	End of year balance		- /line 1	a. a a laa.a /						
2	Provide the estimated percentage of the curre	ent year end baland	-	g, column (a	a)) neid as.					
a	Board designated or quasi-endowment	0/	_%							
b	Permanent endowment	%								
С	Term endowment	-								
•	The percentages on lines 2a, 2b, and 2c shou	•								
за	Are there endowment funds not in the posses	ssion of the organiza	ation tha	at are neid a	ind administe	ered for	ine organ	ization	Г,	<u>, , , , , , , , , , , , , , , , , , , </u>
	by:									res No
	(i) Unrelated organizations								3a(i)	-
	(ii) Related organizations								3a(ii)	-+-
	If "Yes" on line 3a(ii), are the related organizate				·				3b	
4	Describe in Part XIII the intended uses of the		wment	tunds.						
Pai	t VI Land, Buildings, and Equipm									
	Complete if the organization answered	1		i .	î					
	Description of property	(a) Cost or o			or other		ccumulat		(d) Book	value
		basis (investr	nent)	basis	(other)	de	preciation	1		
	Land									
	Buildings									
	Leasehold improvements				0 747		<u> </u>	70	1 ^	0.00
	Equipment			-/	8,747.		65,8	19.	12	,868.
	Other								1 0	,868.
Tota	L Add lines 1a through 1e (Column (d) must ed	rual Form 990 Part	X colur	nn (R) line i	1()C)				12	.000.

Schedule D (Form 990) 2020

Schedule D (Form 990) 2020 TRANSPARENT	EM LTD.	47	-5175472 Page 3
Part VII Investments - Other Securities.			
Complete if the organization answered "Yes"	on Form 990, Part IV, line	e 11b. See Form 990, Part X, line 12.	
(a) Description of security or category (including name of security)	(b) Book value	(c) Method of valuation: Cost or end	d-of-year market value
(1) Financial derivatives			
(2) Closely held equity interests			
(3) Other			
(A)			
(B)			
(C)			
. ,			
(D)			
(E)			
(F)			
(G)			
(H)			
Total. (Col. (b) must equal Form 990, Part X, col. (B) line 12.)			
Part VIII Investments - Program Related.			
Complete if the organization answered "Yes"			-1
(a) Description of investment	(b) Book value	(c) Method of valuation: Cost or end	d-of-year market value
(1)			
(2)			
(3)			
(4)			
(5)			
(6)			
(7)			
(8)			
(9)			
Total. (Col. (b) must equal Form 990, Part X, col. (B) line 13.)			
Part IX Other Assets.			
Complete if the organization answered "Yes"	on Form 990, Part IV, line	e 11d. See Form 990, Part X, line 15.	
(a)	Description		(b) Book value
(1)			
(2)			
(3)			
(4)			
(5)			
(6)			
(7)			
(8)			
(9)			
Total. (Column (b) must equal Form 990, Part X, col. (B) line	e 15)		
Part X Other Liabilities.			
Complete if the organization answered "Yes"	on Form 990 Part IV line	e 11e or 11f See Form 990 Part X line 25	5
1. (a) Description of liability	0111 01111 000, 1 411 14, 1111	5 1 10 01 1 11. 000 1 0111 000, 1 are X, 1110 20	(b) Book value
(1) Federal income taxes			(D) DOM VAIGO
(2)			
(3)			
(4)			
(5)			
(6)			
(7)			

Total. (Column (b) must equal Form 990, Part X, col. (B) line 25.)

2. Liability for uncertain tax positions. In Part XIII, provide the text of the footnote to the organization's financial statements that reports the organization's liability for uncertain tax positions under FASB ASC 740. Check here if the text of the footnote has been provided in Part XIII...

X

Schedule D (Form 990) 2020

(8)

Pai	rt XI Reconciliation of Revenue per Audited Financial Sta	tements With Reven	ue per Return	
	Complete if the organization answered "Yes" on Form 990, Part IV, lir	ne 12a.		
1	Total revenue, gains, and other support per audited financial statements		1	736,617.
2	Amounts included on line 1 but not on Form 990, Part VIII, line 12:			
а	Net unrealized gains (losses) on investments	2a		
b				
С				
	Other (Describe in Part XIII.)			
	Add lines 2a through 2d		2e	0.
3	Subtract line 2e from line 1			736,617.
4	Amounts included on Form 990, Part VIII, line 12, but not on line 1:			
а	Investment expenses not included on Form 990, Part VIII, line 7b	4a		
	Other (Describe in Part XIII.)			
	Add lines 4a and 4b	<u>- </u>	4c	0.
5	Total revenue. Add lines 3 and 4c. (This must equal Form 990, Part I, line 12.)	5	736,617.
Pai	rt XII Reconciliation of Expenses per Audited Financial St	atements With Expe	nses per Retu	rn.
	Complete if the organization answered "Yes" on Form 990, Part IV, lir	ne 12a.		
1	Total expenses and losses per audited financial statements		1	3,645,225.
2	Amounts included on line 1 but not on Form 990, Part IX, line 25:			
а	Donated services and use of facilities	2a		
	Prior year adjustments			
С				
d	Other (Describe in Part XIII.)			
	Add lines 2a through 2d	· · · · · · · · · · · · · · · · · · ·	2e	0.
3	Subtract line 2e from line 1			3,645,225.
4	Amounts included on Form 990, Part IX, line 25, but not on line 1:			
а	Investment expenses not included on Form 990, Part VIII, line 7b	4a		
	Other (Describe in Part XIII.)			
	Add lines 4a and 4b		4c	0.
5				3,645,225.
Pai	rt XIII Supplemental Information.	·		
	ide the descriptions required for Part II, lines 3, 5, and 9; Part III, lines 1a and		Part V, line 4; Part	X, line 2; Part XI,
lines	2d and 4b; and Part XII, lines 2d and 4b. Also complete this part to provide a	ny additional information.		
ם א נ	RT X, LINE 2:			
PAI	AI A, DINE 2:			
TRA	ANSPARENTEM RECOGNIZES THE EFFECT OF IN	COME TAX POSI	TIONS ONLY	IF THOSE
PO9	SITIONS ARE MORE LIKELY THAN NOT OF BEI	NG SHSTATNED	TRANSPARI	entem
BEI	LIEVES THAT IT HAS APPROPRIATE SUPPORT	FOR ANY TAX PO	OSITIONS T	TAKEN, AND
AS	SUCH, DOES NOT HAVE ANY UNCERTAIN TAX	POSITIONS THAT	T ARE MATE	ERIAL TO
$_{ m THI}$	E FINANCIAL STATEMENTS.			

SCHEDULE F (Form 990)

Department of the Treasury Internal Revenue Service

Statement of Activities Outside the United States

► Complete if the organization answered "Yes" on Form 990, Part IV, line 14b, 15, or 16.

Attach to Form 990.

► Go to www.irs.gov/Form990 for instructions and the latest information.

2020
Open to Public Inspection

Name of the organization

Form 990, Part IV, line 14b.

Employer identification number

TRANSPARENTEM LTD. 47-5175472

Part I General Information on Activities Outside the United States. Complete if the organization answered "Yes" on

1 For grantmakers. Does the organization maintain records to substantiate the amount of its grants and other assistance, the grantees' eligibility for the grants or assistance, and the selection criteria used to award the grants or assistance? _____ Yes ____ No

2 For grantmakers. Describe in Part V the organization's procedures for monitoring the use of its grants and other assistance outside the United States.

United States.	ha fallaude e D	t I line O tololo			
3 Activities per Region. (T (a) Region	he following Part (b) Number of	(c) Number of	an be duplicated if additional space is a (d) Activities conducted in the region	i	(f) Total
(a) Region	offices	èmplovees.	(by type) (such as, fundraising, pro-	(e) If activity listed in (d) is a program service,	expenditures
	in the region	agents, and independent	gram services, investments, grants to	' ' '	for and
	l and region	contractors	recipients located in the region)	of service(s) in the region	investments in the region
		in the region		2011211	in the region
EAST ASIA AND THE				CONSULTING PAYMENTS TO	
PACIFIC - AUSTRALIA,				INVESTIGATORS, LOCAL	
BRUNEI, BURMA,	_	_		TRAVEL, MEALS AND	
CAMBODIA,	0	4	PROGRAM SERVICES	HOTELS, ROUND TRIP	277,118.
SOUTH ASIA -				CONSULTING PAYMENTS TO	
AFGHANISTAN,				INVESTIGATORS, LOCAL	
BANGLADESH, BHUTAN,				TRAVEL, MEALS AND	
INDIA, MALDIVES,	0	6	PROGRAM SERVICES	HOTELS, ROUND TRIP	220,449.
EUROPE (INCLUDING					
ICELAND & GREENLAND)					
- ALBANIA, ANDORRA,				ROUND TRIP AIR FARE,	
AUSTRIA, BELGIUM	0	1	PROGRAM SERVICES	HOTELS AND MEALS	14,236.
				CONSULTING EXPENSES FOR	
				INVESTIGATORS AND TRAVEL	
				EXPENSES, ROUND TRIP	
SUB-SAHARAN AFRICA	0	1	PROGRAM SERVICES	AIRFARE, HOTELS, AND	474.
					-
					1
3 a Subtotal	0	12			512,277.
b Total from continuation					
sheets to Part I	0	С			0.
c Totals (add lines 3a					
and 3b)	0	12			512,277.

LHA For Paperwork Reduction Act Notice, see the Instructions for Form 990.

SEE PART V FOR COLUMN (E) DESCRIPTIONS

Schedule F (Form 990) 2020

TRANSPARENTEM LTD.

Grants and Other Assistance to Organizations or Entities Outside the United States. Complete if the organization answered "Yes" on Form 990, Part IV, line 15, for any recipient who received more than \$5,000. Part II can be duplicated if additional space is needed. Part II

(i) Method of valuation (book, FMV, appraisal, other)						Schedule F (Form 990) 2020
(h) Description of noncash assistance						Sche
(g) Amount of noncash assistance					A	
(f) Manner of cash disbursement					recognized as a tax quivalency letter	
(e) Amount of cash grant					foreign country, ction 501(c)(3) ec	
(d) Purpose of grant					Enter total number of recipient organizations listed above that are recognized as charities by the foreign country, recognized as a tax exempt 501(c)(3) organization by the IRS, or for which the grantee or counsel has provided a section 501(c)(3) equivalency letter	
(c) Region					ns listed above that are or sor for which the grantee	or entities
(b) IRS code section and EIN (if applicable)					recipient organizatior inization by the IRS, c	other organizations o
1 (a) Name of organization						3 Enter total number of other organizations or entities

Page 3

Part III Grants and Other Assistance to Individuals Outside the United States. Complete if the organization answered "Yes" on Form 990, Part IV, line 16. Schedule F (Form 990) 2020

Part III can be duplicated if additional space is needed.

of ', ier)						2020
(h) Method of valuation (book, FMV, appraisal, other)						Schedule F (Form 990) 2020
ab ab						hedule F (
ption of ssistance						Sol
(g) Description of noncash assistance						
(f) Amount of noncash assistance						
(e) Manner of cash disbursement						
(e) Ma cash disb						
<u></u>						
(d) Amount of cash grant						
(c) Number of recipients						
(c) Nu recip						
gion						
(b) Region						
lce						
or assistar						
(a) Type of grant or assistance						
(a) Type						

	Instructions for Form 5713; don't file with Form 990)	Yes	X No
6	Did the organization have any operations in or related to any boycotting countries during the tax year? If "Yes," the organization may be required to separately file Form 5713, International Boycott Report (see		
5	Did the organization have an ownership interest in a foreign partnership during the tax year? If "Yes," the organization may be required to file Form 8865, Return of U.S. Persons With Respect to Certain Foreign Partnerships (see Instructions for Form 8865)	Yes	X No
4	Was the organization a direct or indirect shareholder of a passive foreign investment company or a qualified electing fund during the tax year? If "Yes," the organization may be required to file Form 8621, Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund (see Instructions for Form 8621)	Yes	X No
3	Did the organization have an ownership interest in a foreign corporation during the tax year? If "Yes," the organization may be required to file Form 5471, Information Return of U.S. Persons With Respect to Certain Foreign Corporations (see Instructions for Form 5471)	Yes	X No
2	Did the organization have an interest in a foreign trust during the tax year? If "Yes," the organization may be required to separately file Form 3520, Annual Return To Report Transactions With Foreign Trusts and Receipt of Certain Foreign Gifts, and/or Form 3520-A, Annual Information Return of Foreign Trust With a U.S. Owner (see Instructions for Forms 3520 and 3520-A; don't file with Form 990)	Yes	X No
1	Was the organization a U.S. transferor of property to a foreign corporation during the tax year? If "Yes," the organization may be required to file Form 926, Return by a U.S. Transferor of Property to a Foreign Corporation (see Instructions for Form 926)	Yes	X No

032074 12-03-20

Schedule F (Form 990) 2020

SCHEDULE J (Form 990)

Compensation Information

For certain Officers, Directors, Trustees, Key Employees, and Highest

Compensated Employees

Complete if the organization answered "Yes" on Form 990, Part IV, line 23. ► Attach to Form 990.

► Go to www.irs.gov/Form990 for instructions and the latest information.

OMB No. 1545-0047

Open to Public Inspection

Name of the organization

Part I Questions Regarding Compensation

Department of the Treasury

Internal Revenue Service

TRANSPARENTEM LTD.

Employer identification number 47-5175472

	·		Yes	No
1 a	Check the appropriate box(es) if the organization provided any of the following to or for a person listed on Form 990,			
	Part VII, Section A, line 1a. Complete Part III to provide any relevant information regarding these items.			
	First-class or charter travel			
	Travel for companions Payments for business use of personal residence			
	Tax indemnification and gross-up payments Health or social club dues or initiation fees			
	Discretionary spending account Personal services (such as maid, chauffeur, chef)			
b	If any of the boxes on line 1a are checked, did the organization follow a written policy regarding payment or			
	reimbursement or provision of all of the expenses described above? If "No," complete Part III to explain	1b		
2	Did the organization require substantiation prior to reimbursing or allowing expenses incurred by all directors,			
	trustees, and officers, including the CEO/Executive Director, regarding the items checked on line 1a?	2		
3	Indicate which, if any, of the following the organization used to establish the compensation of the organization's			
	CEO/Executive Director. Check all that apply. Do not check any boxes for methods used by a related organization to			
	establish compensation of the CEO/Executive Director, but explain in Part III.			
	X Compensation committee Written employment contract			
	Independent compensation consultant X Compensation survey or study			
	X Form 990 of other organizations X Approval by the board or compensation committee			
4	During the year, did any person listed on Form 990, Part VII, Section A, line 1a, with respect to the filing			
	organization or a related organization:			
а	Receive a severance payment or change-of-control payment?	4a		X
b	Participate in or receive payment from a supplemental nonqualified retirement plan?	4b		X
С	Participate in or receive payment from an equity-based compensation arrangement?	4c		X
	If "Yes" to any of lines 4a-c, list the persons and provide the applicable amounts for each item in Part III.			
	Only section 501(c)(3), 501(c)(4), and 501(c)(29) organizations must complete lines 5-9.			
5	For persons listed on Form 990, Part VII, Section A, line 1a, did the organization pay or accrue any compensation			
	contingent on the revenues of:			
а	The organization?	5a		X
b	Any related organization?	5b		X
	If "Yes" on line 5a or 5b, describe in Part III.			
6	For persons listed on Form 990, Part VII, Section A, line 1a, did the organization pay or accrue any compensation			
	contingent on the net earnings of:			
а	The organization?	6a		X
b	Any related organization?	6b		X
	If "Yes" on line 6a or 6b, describe in Part III.			
7	For persons listed on Form 990, Part VII, Section A, line 1a, did the organization provide any nonfixed payments			
	not described on lines 5 and 6? If "Yes," describe in Part III	7		X
8	Were any amounts reported on Form 990, Part VII, paid or accrued pursuant to a contract that was subject to the			
	initial contract exception described in Regulations section 53.4958-4(a)(3)? If "Yes," describe in Part III	8		X
9	If "Yes" on line 8, did the organization also follow the rebuttable presumption procedure described in			
	Regulations section 53.4958-6(c)?	9		

LHA For Paperwork Reduction Act Notice, see the Instructions for Form 990.

Schedule J (Form 990) 2020

Part II Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees. Use duplicate copies if additional space is needed. TRANSPARENTEM LTD. Schedule J (Form 990) 2020

For each individual whose compensation must be reported on Schedule J, report compensation from the organization on row (i) and from related organizations, described in the instructions, on row (ii). Do not list any individuals that aren't listed on Form 990, Part VII.

Note: The sum of columns (B)(i)-(iii) for each listed individual must equal the total amount of Form 990, Part VII, Section A, line 1a, applicable column (D) and (E) amounts for that individual.

		(B) Breakdown of \	(B) Breakdown of W-2 and/or 1099-MISC compensation	SC compensation	(C) Retirement and	(D) Nontaxable	(E) Total of columns	(F) Compensation
(A) Name and Title		(i) Base compensation	(ii) Bonus & incentive compensation	(iii) Other reportable compensation	other deferred compensation	benefits	(B)(i)-(D)	in column (B) reported as deferred on prior Form 990
(1) TIMOTHY R. SANDLER	Ξ	234,852.	0	0	* 860 ' 6	21,042.	264,987.	0
VP OF INVESTIGATIONS	(ii)	0	0	• 0		0	0	0
(2) E. BENJAMIN SKINNER	Ξ	206,000.	0	0	8,240.	824.	215,064.	0
PRESIDENT	<u>=</u>		0	• 0	• 0	0 •	0	• 0
(3) CAM TU RINSCHE	Ξ	191,274.	0	• 0	008'4	11,481.	210,555.	0
VP OF STRATEGIC ENGAGEMENT	€	0	0	0	0	0	0	0
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Schedule J (Form 990) 2020

TRANSPARENTEM LTD.

Provide the information, explanation, or descriptions required for Part I, lines 1a, 1b, 3, 4a, 4b, 4c, 5a, 5b, 6a, 6b, 7, and 8, and for Part II. Also complete this part for any additional information.	art II. Also complete this part for any additional information.
	Schedule J (Form 990) 2020

SCHEDULE O

Internal Revenue Service

(Form 990 or 990-EZ) Department of the Treasury

Supplemental Information to Form 990 or 990-EZ

Complete to provide information for responses to specific questions on Form 990 or 990-EZ or to provide any additional information.

► Attach to Form 990 or 990-EZ Go to www.irs.gov/Form990 for the latest information. OMB No. 1545-0047 Open to Public

Inspection

Name of the organization

TRANSPARENTEM LTD.

Employer identification number 47-5175472

FORM 990, PART III, LINE 1, DESCRIPTION OF ORGANIZATION MISSION:

ABUSES IN GLOBAL SUPPLY CHAINS.

FORM 990, PART VI, SECTION B, LINE 11B:

THE 990 IS REVIEWED BY THE BOARD TREASURER. THE FULL BOARD IS PROVIDED A COPY OF THE RETURN BEFORE IT IS SIGNED BY THE PRESIDENT AND FILED WITH THE IRS.

FORM 990, PART VI, SECTION B, LINE 12C:

ALL OFFICERS, BOARD MEMBERS AND STAFF ARE REQUIRED TO DISCLOSE ANY CONFLICTS AND SIGN A CONFLICT OF INTEREST POLICY WHEN THEY FIRST JOIN THE BOARD OR ORGANIZATION, AND EVERY YEAR AFTER. THE BOARD SECRETARY FOLLOWS UP AND ENFORCES COMPLIANCE WITH THE POLICY.

FORM 990, PART VI, SECTION B, LINE 15:

THE BOARD COMPENSATION COMMITTEE USES MARKET DATA FOR SIMILAR ORGANIZATIONS IN THE NEW YORK AREA, AS WELL AS THE 990S OF OTHER SIMILAR NON-PROFIT ORGANIZATIONS IN DETERMINING THE COMPENSATION FOR THE PRESIDENT, OFFICERS AND KEY EMPLOYEES. THE COMPENSATION COMMITTEE THEN RECOMMENDS THE COMPENSATION OF THE PRESIDENT, OFFICERS AND KEY EMPLOYEES TO THE BOARD, WHO WILL CONSIDER IT AND VOTE ON IT. THE LAST SUCH COMPENSATION REVIEW TOOK PLACE IN FEBRUARY 2019. THE ORGANIZATION HIRED A CONSULTING FIRM IN 2021 WHICH A COMPREHENSIVE COMPENSATION REVIEW WILL BE COMPLETED.

FORM 990, PART VI, SECTION C, LINE 19:

THE ORGANIZATION MAKES ITS GOVERNING DOCUMENTS, CONFLICT OF INTEREST POLICY LHA For Paperwork Reduction Act Notice, see the Instructions for Form 990 or 990-EZ. Schedule O (Form 990 or 990-EZ) 2020

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Name of the organization TRANSPARENTEM LTD.	Employer identification number 47-5175472
AND FINANCIAL STATEMENTS AVAILABLE TO THE PUBLIC UPON REQ	QUEST.
FORM 990, PART IX, LINE 11G, OTHER FEES:	
PAYROLL SERVICE FEES:	
PROGRAM SERVICE EXPENSES	6,544.
MANAGEMENT AND GENERAL EXPENSES	723.
FUNDRAISING EXPENSES	241.
TOTAL EXPENSES	7,508.
CONTRACTED SERVICES:	
PROGRAM SERVICE EXPENSES	518,623.
MANAGEMENT AND GENERAL EXPENSES	470
FUNDRAISING EXPENSES	3,799
TOTAL EXPENSES	522,892.
IT SERVICES:	
PROGRAM SERVICE EXPENSES	86,806
MANAGEMENT AND GENERAL EXPENSES	9,596
FUNDRAISING EXPENSES	3,199
TOTAL EXPENSES	99,601
TOTAL OTHER FEES ON FORM 990, PART IX, LINE 11G, COL A	630,001
FORM 990, PART XII, LINE 2C:	
THE ORGANIZATION HAS NOT CHANGED ITS OVERSIGHT PROCESS OF	R SELECTION
PROCESS DURING THE YEAR.	

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SCHEDULE R (Form 990)

Related Organizations and Unrelated Partnerships

► Complete if the organization answered "Yes" on Form 990, Part IV, line 33, 34, 35b, 36, or 37.

► Attach to Form 990.

2020	Open to Public Inspection
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OMB No. 1545-0047

Employer identification number 47-5175472

Go to www.irs.gov/Form990 for instructions and the latest information.

TRANSPARENTEM LTD.

Name of the organization Department of the Treasury Internal Revenue Service

(g) Section 512(b)(13) controlled Schedule R (Form 990) 2020 ŝ entity? Direct controlling Yes entity Identification of Related Tax-Exempt Organizations. Complete if the organization answered "Yes" on Form 990, Part IV, line 34, because it had one or more related tax-exempt organizations during the tax year. 3,370. TRANSPARENTEM Direct controlling entity End-of-year assets status (if section Public charity 501(c)(3)) <u>e</u> Total income Exempt Code ত section ত্ত Identification of Disregarded Entities. Complete if the organization answered "Yes" on Form 990, Part IV, line 33. Legal domicile (state or Legal domicile (state or foreign country) foreign country) DELAWARE PROCESSING CONTRACTOR Primary activity Primary activity <u>@</u> TRANSACTIONS For Paperwork Reduction Act Notice, see the Instructions for Form 990. -32-0529508Name, address, and EIN (if applicable) Name, address, and EIN of related organization of disregarded entity APPLIED RESEARCH SERVICES, LLC 405 LEXINGTON AVE., STE. 29A NEW YORK, NY 10174 Part I Part II

47-5175472

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TRANSPARENTEM LTD.

Schedule R (Form 990) 2020

Part III organization of Related Organizations Taxable as a Partnership. Complete if the organization answered "Yes" on Form 990, Part IV, line 34, because it had one or more related organizations treated as a partnership during the tax year.

(j) (k) General or Percentage managing ownership partner? Yes No			more related	(i) Section Section 512(b)(13) controlled entity? Yes No			Schedule B (Form 990) 2020
(j) General or managing partner?			le or	(h) sentag nershi			E (F)
Code V-UBI camount in box 20 of Schedule K-1 (Form 1065)			, because it had or	(g) (h) Share of Percentage end-of-year ownership assets			Schodule
(h) Disproportionate allocations?			Part IV, line 34	(f) Share of total income			-
(g) Share of end-of-year assets			on Form 990,	tity Share orp,			
(f) Share of total income			swered "Yes" o	(C corp, S corp, or trust)			
			ganization an	(d) Direct controlling entity			
(e) Predominant income (related, unrelated, excluded from tax under sections 512-514)			mplete if the or	(c) Legal domicile Dir (state or foreign country)			42
(d) Direct controlling entity			oration or Trust. Co year.	(b) ary activity			-
(c) Legal domicile (state or foreign country)			as a Corpoing the tax	(b)			
(b) Primary activity			ganizations Taxable	N. C.			
(a) Name, address, and EIN of related organization			Part IV Identification of Related Organizations Taxable as a Corporation or Trust. Complete if the organization answered "Yes" on Form 990, Part IV, line 34, because it had one or more related organizations treated as a corporation or trust during the tax year.	(a) Name, address, and EIN of related organization			032162 10-28-20

Page 3

Part V Transactions With Related Organizations. Complete if the organization answered "Yes" on Form 990, Part IV, line 34, 35b, or 36.

				ľ	\vdash
Note: Complete line in any entity is listed in Parts in, in, or it of the following transactions with one or more related organizations listed in Darts II.IV.	ay ayom yo ado diwy ac	Patail anditational letak	is Darte II.175		Les Se
a Beceint of (i) interest (ii) annuities (iii) rovalties or (iv) rent from a controlled entity				7	
				3 ;	
b Giff, grant, or capital contribution to related organization(s)				<u>α</u>	
c Gift, grant, or capital contribution from related organization(s)				9	
d Loans or loan guarantees to or for related organization(s)				1d	
				9	
				ì	
Lividends from related organization(s)				=	
g Sale of assets to related organization(s)				19	
Purchase of assets from related organization(s)				1h	
				;=	
				Ŧ	
				-	
k Lease of facilities, equipment, or other assets from related organization(s)				¥	
	anization(s)			F	
m Performance of services or membership or fundraising solicitations by related organization(s)	anization(s)			<u></u> <u> </u>	
Sharing of facilities equipment mailing lists or other assets with relat	ion(s)				
Observe of paid ownloaded with valeted accountants					
o sharing of paid employees with related organization(s)				2	
				,	
				<u>و</u>	
q Reimbursement paid by related organization(s) for expenses				무	_
 r Other transfer of cash or property to related organization(s) 				+	
s Other transfer of cash or property from related organization(s)				15	
2 If the answer to any of the above is "Yes," see the instructions for information on who must complete this line, including covered relationships and transaction thresholds.	who must complete the	is line, including covered	relationships and transaction thresholds.		
(a) Name of related organization	(b) Transaction	(c) Amount involved	(d) Method of determining amount involved	nvolved	
	type (a-s)				
(2)					
(3)					
(4)					
(5)					
032163 10-28-20	43		Schedule	e R (Form	Schedule R (Form 990) 2020
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Part VI Unrelated Organizations Taxable as a Partnership. Complete if the organization answered "Yes" on Form 990, Part IV, line 37.

Provide the following information for each entity taxed as a partnership through which the organization conducted more than five percent of its activities (measured by total assets or gross revenue) that was not a related organization. See instructions regarding exclusion for certain investment partnerships.

(k) centage	nership				0000
or Perc	§ 0 0 0 0				- S
(j) General	managing partner? Yes No				
(i) Code V-UBI	amount in box 20 of Schedule K-1 (Form 1065)				Schodula B (Form 090) 2020
(h)	ionate allocations?				
Disi					
(g) Share of	end-of-year assets				
(f) Share of					
(e) Are all A partners sec.	501(c)(3) orgs.?				
(d) Predominant income	(related, unrelated, excluded from tax under sections 512-514)				
(c) Legal domicile					
(b) Primary activity					
(a) (b) (c) (d) (d) Name, address, and EIN Primary activity Legal domicile Predominant income	of entity				